

*CRIS, et al.*

*vs.*

*CHARLES NORMAN*

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Deposition of

**Derek Casper**

Volume I

May 23, 2019

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   SOUTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION

3   COMMUNITY REFUGEE AND           )  
4   IMMIGRATION SERVICES;        )  
5   GUMAA ISMAIL YAHYA            )  
6   IBRAHIM; AND BADRELDIN        )  
7   RAHOUMA, ON BEHALF OF         )  
8   THEMSELVES AND ALL OTHERS     )  
9   SIMILARLY SITUATED,           )  
10                                    )  
11                                    )

12               Plaintiffs,            )

13               vs.                    )

14   CHARLES NORMAN,                )  
15   REGISTRAR, OHIO BUREAU OF     )  
16   MOTOR VEHICLES, IN HIS         )  
17   OFFICIAL CAPACITY,             )  
18                                    )  
19                                    )  
20               Defendant.            )

VOLUME I OF II  
Civil Action No.  
2:18-cv-1189

21                                   - - -

22                   (Continued on the next page)

23

24

1 INTERCOMMUNITY JUSTICE AND )  
PEACE CENTER; ERLIN LORENA )  
2 RODRIGUEZ ENAMORADO, )  
INDIVIDUALLY AND AS NEXT )  
3 FRIEND OF J.G.R., MARIA )  
MONJARAZ, INDIVIDUALLY AND )  
4 AS NEXT FRIEND OF A.M.; )  
AND MARIA CABRERA, )  
5 INDIVIDUALLY AND AS NEXT )  
FRIEND OF K.I.A., ON )  
6 BEHALF OF THEMSELVES AND )  
ALL OTHERS SIMILARLY )  
7 SITUATED, )

8 Plaintiffs, )

9 vs. )

Civil Action No.  
2:18-cv-1247

10 CHARLES NORMAN, REGISTRAR, )  
OHIO BUREAU OF MOTOR )  
11 VEHICLES, IN HIS OFFICIAL )  
CAPACITY, )

12 Defendant. )  
13

14 VOLUME I

15 DEPOSITION

16 of DEREK CASPER

17

18 Taken at the offices of  
19 Ohio Department of Public Safety  
1970 West Broad Street  
20 Columbus, Ohio 43223

21 on May 23, 2019, at 8:59 a.m.

22

23 Reported by: Julia Lamb, RPR, CRR

24 --0--

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13 ALSO PRESENT:

14 Winston Ford, Esq., Ohio Department of  
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16 Nicholas Pasquarello  
17 Todd Ballinger  
18 Christina Bizios  
19  
20  
21  
22  
23  
24

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STIPULATIONS

It is stipulated by and among counsel for the respective parties that the deposition of DEREK CASPER, the witness herein, called by the Plaintiffs under the applicable Rules of Federal Civil Court Procedure, may be taken at this time by the notary pursuant to notice; that said deposition may be reduced to writing in stenotypy by the notary, whose notes thereafter may be transcribed out of the presence of the witness; and that the proof of the official character and qualification of the notary is waived.

--0--

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1 DEREK CASPER

2 being first duly sworn, as hereinafter certified,  
3 deposes and says as follows:

4 CROSS-EXAMINATION

5 BY MS. BROWN:

6 Q. Good morning, Mr. Casper. My name is  
7 Emily Brown, and I am one of the counsel for the  
8 Plaintiffs in the two lawsuits, IJPC v. Norman  
9 and CRIS v. Norman. I'm going to be taking your  
10 deposition today. Have you ever had your  
11 deposition taken before?

12 A. No.

13 Q. Okay. Have you ever testified in court?

14 A. No.

15 Q. Okay. I'll start by reviewing a few  
16 ground rules of deposition so that we're on the  
17 same page today. The court reporter will be  
18 transcribing everything that both of us say  
19 today. So in order for her to be able to do her  
20 job most effectively I will wait to ask another  
21 question until you respond, and if you could  
22 also wait to answer the question until I finish  
23 asking so we don't talk over each other, I would  
24 appreciate it. Is that okay?

1           A.   Yes.

2           Q.   We also need to make sure that all of  
3   our -- that everything we say is words and not  
4   gestures or uh-huh, huh-uh, things like that so  
5   that she can properly take everything down. Is  
6   that okay?

7           A.   Yes.

8           Q.   If you don't understand a question, I  
9   would ask that you please ask me to repeat it or  
10   rephrase it. Is that okay?

11          A.   Yes.

12          Q.   So if you answer a question, can I  
13   assume that you've understood what the question  
14   is?

15          A.   Yes.

16          Q.   Please ask for a break whenever you need  
17   one. I would just ask that if a question is  
18   pending please answer that question and then ask  
19   for a break. Is that okay?

20          A.   Yes.

21          Q.   Great. This is fairly basic, but when I  
22   use the acronym BMV throughout the deposition  
23   I'll be referring to the Bureau of Motor  
24   vehicles.

1 A. Okay.

2 Q. Great. Are you familiar with the  
3 Systematic Alien Verification for Entitlements?

4 A. Yes.

5 Q. When I use the acronym SAVE, I will be  
6 talking about that program. Is that okay?

7 A. Yes.

8 Q. Okay. I believe that you will be  
9 testifying to all the topics in the deposition  
10 except 13, 17 and 24. Is that correct?

11 A. Yes, except for references to fraud and  
12 things like that. That will be --

13 Q. Okay. And Mr. Ballinger will be  
14 testifying to those three topics after you're  
15 finished?

16 A. Correct.

17 Q. All right. Please state your full name.

18 A. It's Derek Casper.

19 Q. And is there any reason that you  
20 wouldn't be able to answer my questions  
21 truthfully today?

22 A. No.

23 Q. Are you under the influence of any  
24 medications that could impair your ability to

1 give accurate and truthful testimony?

2 A. No.

3 Q. And you understand that you're under  
4 oath today and must answer all questions  
5 truthfully as if we were in court?

6 A. Yes.

7 Q. I also want to remind you that given  
8 that this is a deposition under Rule 30(b)(6)  
9 that you're speaking on behalf of the BMV today  
10 and not on behalf of yourself. Do you  
11 understand that?

12 A. Yes.

13 Q. Okay. Tell me everything that you did  
14 to get ready for your deposition today.

15 A. To get ready for the deposition, you  
16 know, in preparation, produced discovery, the  
17 documents related to that, you know, prepared,  
18 sat in meetings with BMV, DPS attorneys, sat in  
19 sessions with the Attorney General's Office as  
20 well in preparation, and just reviewed the  
21 documents as well as, you know, with  
22 administrator, registrar's office, respective  
23 individuals above myself, and collaborated to  
24 make sure we produced the appropriate documents

1 that were requested.

2 Q. Okay. Have you reviewed all of the  
3 documents that were produced to the Plaintiffs  
4 during discovery?

5 A. Yes.

6 Q. And which other individuals at the BMV  
7 did you meet with?

8 A. I've met with my administrator, I've met  
9 with the registrar's office which includes the  
10 registrar himself.

11 Q. Mr. Norman?

12 A. Yes. The registrar, the assistant  
13 registrar, Ann Dean, and the chief of staff,  
14 Curt Mayhew, was in there as well. I've met  
15 with -- Winston has been included, the  
16 individuals from the Attorney General's Office,  
17 whoever they have presented as well, and then,  
18 you know, my chain of command which includes, as  
19 I said, my administrator, and then two  
20 individuals above me, which is the assistant  
21 chief and chief of our field operation section.

22 Q. And what are the names of the  
23 administrator and the assistant chief  
24 administrator?

1           A. Tom Wilson is the administrator, and  
2     Mary Brunton is assistant chief, and Michael  
3     Deschaine is the chief.

4           Q. Okay. And when you referred to the fact  
5     that you reviewed the documents, was that in  
6     preparation for the deposition today or was that  
7     back when you were compiling them to be sent  
8     over to us or both?

9           A. Both, just a continuous review.

10          Q. Okay. Did you also review the 30(b)(6)  
11     notice, deposition notice?

12          A. Yes.

13          Q. Did you review the complaints in the  
14     case?

15          A. Yes.

16          Q. Any other filings with the court in  
17     these two cases?

18          A. I've read what's been provided to me  
19     which are the complaints, the 30(b)(6) notice,  
20     and then the produced discovery, but other than  
21     that I haven't read anything.

22          Q. Okay. Did you speak with Angela Dicken  
23     [sic]?

24          A. She was previously my supervisor before

1 I became the supervisor of the license control  
2 section, but I've not spoken with her since she  
3 retired in July -- I'm sorry, December of 2017  
4 is when she retired.

5 Q. Okay. Mr. Casper, what's your date of  
6 birth?

7 A. April 27th, 1992.

8 Q. And where were you born?

9 A. Warren, Ohio.

10 Q. Where do you live now?

11 A. Columbus, Ohio.

12 Q. And who do you live with?

13 A. I live with my girlfriend.

14 Q. Okay. Any children?

15 A. No.

16 Q. Do you have any family members who work  
17 for the Ohio BMV?

18 A. I do not.

19 Q. What about the Department of Public  
20 Safety?

21 A. I do not.

22 Q. Okay. And where did you graduate from  
23 high school?

24 A. Chalker High School in Southington,

1 Ohio.

2 Q. And what education, if any, have you  
3 completed beyond high school?

4 A. I've completed some college courses,  
5 approximately two and a half years or so.

6 Q. And what type of coursework did you  
7 study?

8 A. Mostly the focus was international  
9 studies with some foreign language courses and  
10 things like that.

11 Q. What foreign language?

12 A. I've taken a little bit of Mandarin,  
13 Chinese, Italian and French.

14 Q. And why did you leave college?

15 A. I just took positions -- full-time  
16 positions that led me away from my education.

17 Q. Are you currently studying part-time at  
18 any university now?

19 A. I was, but I haven't in about a year.

20 Q. Okay. How long have you been employed  
21 by the BMV?

22 A. It's going on three years next month so  
23 it's been two years and 11 months.

24 Q. And before you started working for the



1     BMV, where did you work?

2           A.   I worked for the United States Postal  
3     Service as well as the Ohio Army National Guard  
4     with some other jobs mixed in obviously.

5           Q.   Okay.  So with the postal service what  
6     was your -- what were your job responsibilities?

7           A.   I was a mail carrier, driving mail  
8     carrier.

9           Q.   And before that, you said you worked  
10    with the National Guard?

11          A.   Yes.

12          Q.   And what did you do there?

13          A.   I was an all source intelligence  
14    analyst.

15          Q.   And what were those types of -- what  
16    kind of job duties did you have there?

17          A.   Just reviewing intelligence and  
18    information that was provided to me by the  
19    collectors within the military, preparing  
20    briefings for the higher up and superiors who  
21    requested it, putting together all the  
22    information they gave me and just trying to  
23    provide the best possible solution and gathering  
24    of the information I could.

1 Q. How long did you hold that position?

2 A. I was in the National Guard for six  
3 years.

4 Q. And before you were in the National  
5 Guard, were you in college at that point?

6 A. High school.

7 Q. High school. Okay.

8 So at the BMV you said you started  
9 almost three years ago. What job title did you  
10 have when you started?

11 A. Customer service assistant two.

12 Q. And what does a customer service  
13 assistant two do?

14 A. They have varying responsibilities  
15 across the BMV. The customer service assistant  
16 two is in various departments. The purpose of  
17 the position I held was in license control which  
18 is the position I'm still currently in in that  
19 section. It's mostly answering phone calls  
20 pertaining to whatever section that individual  
21 works in.

22 In my case, license control, we take  
23 calls from deputy registrars, provide  
24 information and solution to them and more advice

1 on how to proceed with driver's license  
2 issuance.

3 Q. Okay. And how long did you work as a  
4 customer service agent two?

5 A. It was 19 months.

6 Q. And after that, what job did you hold?

7 A. It's when I got promoted to customer  
8 service manager.

9 Q. Then have you been a customer service  
10 manager for a little less than a year and a  
11 half?

12 A. Yes. It was -- I took the position  
13 temporarily for a month and got it permanently  
14 February of 2018.

15 Q. Okay. And what -- during the time that  
16 you've been a customer service manager, have  
17 your duties remained the same for that entire  
18 period?

19 A. Yes.

20 Q. And what are those duties?

21 A. I manage up to 15 employees. We do have  
22 another manager in the section. We split the  
23 personnel responsibilities and responsibilities  
24 in general for the overall premise of our

1 section. When it comes to the information  
2 regarding USCIS, we treat that information as  
3 well as we can. We advise our employees on it  
4 as well as the policies regarding driver's  
5 license issuance, providing advice to deputy  
6 registrar and their clerks.

7 Q. Okay. And who is the -- what's the name  
8 of the other manager?

9 A. Chad Adkins.

10 Q. And is your -- do your duties differ  
11 from Mr. Adkins' duties in any way?

12 A. I would say on paper not necessarily,  
13 but I'm often more involved in the meetings  
14 regarding USCIS, the central issuance process,  
15 and just meetings pertaining to information  
16 related to that.

17 Q. And when you say meetings, do you mean  
18 with other BMV staff?

19 A. Yes, whoever is determined to need to be  
20 involved in that.

21 Q. And who is your current supervisor?

22 A. Mary Brunton, the assistant chief I  
23 mentioned earlier.

24 Q. And before you were promoted to customer

1 service manager, I think you said that

2 Ms. Dicken was your supervisor?

3 A. Yeah, Angela Dickens was the supervisor,  
4 yeah.

5 Q. Dickens with an S?

6 A. Dickens with an S, yeah.

7 Q. I'm sorry. And the job that she held at  
8 that time before she retired is the same as the  
9 job that you hold now, correct?

10 A. Correct.

11 Q. Are there any differences in  
12 responsibilities or duties?

13 A. The SAVE responsibilities evolved as  
14 well as the responsibilities of central  
15 issuance. They were not -- they weren't doing  
16 central issuance when she was the supervisor so  
17 that's obviously an incremental change as well.

18 Q. When you say central issuance, is that  
19 the name of the -- is there a department called  
20 central issuance?

21 A. No. The central issuance is the process  
22 that BMV implemented in July of 2018 where the  
23 licenses are no longer printed at the deputy  
24 registrars. They're mailed from a centralized

1 location.

2 Q. So your department deals with certain  
3 matters related to central issuance?

4 A. Yeah. My department deals with all  
5 matters related to license issuance. We're not  
6 the holders of the central issuance process, but  
7 when deputy registrars have questions pertaining  
8 to that, we answer that to the best of our  
9 abilities.

10 Q. Okay.

11 MS. BROWN: I'm going to have this  
12 marked as Exhibit 1. This is the notice, the  
13 Rule 30(b)(6) Notice.

14 --0--

15 (Deposition Exhibit 1 marked.)

16 --0--

17 MR. HONEN: This is the latest one,  
18 correct?

19 MS. BROWN: Yes.

20 BY MS. BROWN:

21 Q. So, Mr. Casper, as a result of  
22 discussions with your counsel, there's a few  
23 changes in this from the one that we filed a  
24 couple weeks ago, so I just wanted you to have

1 an updated copy if you hadn't already.

2 But have you reviewed the amended Rule  
3 30(b)(6) notice?

4 A. I reviewed the one that was provided --  
5 I would say a week and a half ago I think was  
6 the most recent revision I received, yes.

7 Q. Okay. So this one is slightly  
8 different, but there's only a few wording  
9 changes in a few topics. So as we go through  
10 the topics, you can obviously look at each  
11 topic, but there hasn't been a lot of changes so  
12 we're going to start with topic one. How many  
13 customer service managers are there  
14 approximately at the BMV?

15 A. At the BMV alone? I can't speak to the  
16 number.

17 Q. It's a large number?

18 A. There's one for I would say every  
19 section that -- almost every section, and I  
20 couldn't give a true estimation.

21 Q. Okay. But the customer service managers  
22 all have slightly different job  
23 responsibilities, right?

24 A. Depending on the section, yes.

1 Q. Okay. So your section is really the  
2 only one that deals specifically with issues  
3 related to USCIS forms and documentation  
4 requirements for noncitizens and that kind of  
5 thing?

6 A. Yes.

7 Q. Are you covered by Collective Bargaining  
8 Agreement?

9 A. No.

10 Q. Are other employees at the BMV covered  
11 by Collective Bargaining Agreement?

12 A. Yes, nonexempt employees are.

13 Q. So you're an exempt employee?

14 A. Yes.

15 Q. Are the customer service manager twos  
16 nonexempt?

17 A. Customer service assistant twos, yes.

18 Q. Now, when I say the term license  
19 control, what does that mean to you?

20 A. That is the section that I work in that  
21 I'm the customer service manager of.

22 Q. So are you -- in addition to being a  
23 customer service manager would you also say that  
24 you're the head of license control?



1           A. I would say co-head, as I discussed  
2 earlier, with Chad Adkins.

3           Q. Okay. And you've held that role since  
4 about December 2017, correct?

5           A. No. Temporarily in January 2018 and  
6 then permanently February 2018.

7           Q. Okay. And how long did Ms. Dickens hold  
8 that position before you?

9           A. I can't speak to the duration.

10          Q. But it was at least several years that  
11 you know of, or you don't know?

12          A. I can't speak to the duration. I don't  
13 know that answer.

14          Q. Okay. Does the head of license control  
15 have a role in drafting BMV policies?

16          A. The role is if it affects us, then it  
17 passes through us, and we just review it to make  
18 sure that it, you know, fits in with current  
19 practices, or it may not fit in with current  
20 practices, but we may review it. We don't  
21 necessarily take part in, you know, applying  
22 much change to it, just more of an oversight of  
23 it so we know what's going on and what's  
24 changing.

1 Q. So you wouldn't be the actual drafters  
2 of any language, you would review what someone  
3 else had drafted?

4 A. Correct. I may provide information that  
5 may lead to, but I don't draft the language of  
6 such.

7 Q. And would that be true for things like  
8 changes to the Driver Manual or the Deputy  
9 Registrar Procedure Manual?

10 A. If there's procedures in the Driver  
11 Manual, I may be included in the language that's  
12 going to be changed for that. If it's overall  
13 broader policy, no, but if it's policy related  
14 to the driver's manual and direct license  
15 issuance, yes, I would be involved with that.

16 Q. So can you give some examples of the  
17 types of policies that you would have  
18 participated in either reviewing or helping  
19 formulate?

20 A. Policies related to the central issuance  
21 process I discussed earlier on how deputy  
22 registrars may handle that; policies regarding  
23 issuance to non-U.S. citizens, to U.S. citizens,  
24 documents and how to enter information into the

1     SAVE system that's integrated through our  
2     internal IT systems, as well as, you know,  
3     information on how the deputy registrars should  
4     proceed in issuing a license in general.

5           Q.   Okay.  The current registrar is  
6     Mr. Norman, correct?

7           A.   Yes.

8           Q.   And when was -- when did he start the  
9     position?

10          A.   January 2019.  I do not know the exact  
11     date.

12          Q.   Okay.  And before that it was Mr. Petit?

13          A.   Yes.

14          Q.   And do you know how long Mr. Petit was  
15     the registrar?

16          A.   I don't know the exact answer.

17          Q.   Okay.  Are there any departments other  
18     than license control that have personnel in  
19     which knowledge of immigration status or legal  
20     presence is required?

21          A.   Are there other sections that have  
22     knowledge of it?

23          Q.   Where they need to have knowledge of it  
24     for their roles.

1           A. Several sections work with information  
2   that touches USCIS, yes.

3           Q. And what would that -- what are those  
4   sections?

5           A. You have our section that works on the  
6   individual systems to ensure they're  
7   functioning. So they have to have some  
8   knowledge on how it works just so they can make  
9   sure the systems are working.

10           Our commercial driver's license section,  
11   CDL section, has to have knowledge. Because of  
12   the legal presence requirements for CDL, they  
13   have to make sure what's required and what's  
14   not, so those are two sections in particular.

15           Q. Okay. And is there a particular  
16   department in the BMV that deals with training  
17   deputy registrars on issues related to legal  
18   presence and appropriate documentation for  
19   noncitizens?

20           A. They use the deputy registrar manual  
21   that is out there, the procedure manual, and the  
22   sections contained in that and there are some  
23   documents, I assume, that are, you know, out  
24   there for them to use inside of the portal that

1 we've provided.

2           However, the training for the deputy  
3 registrars themselves are independently managed,  
4 because they are individuals that are privately  
5 contracted. The field representative staff that  
6 works -- that is state employees with the BMV,  
7 they may assist in coordinating training and  
8 getting individuals together, but the training  
9 for the clerks themselves at the deputy  
10 registrars are the responsibility of the deputy  
11 registrar typically.

12       Q. And is there training for employees  
13 within license control on the matters related to  
14 immigration status and documentation for legal  
15 presence and that kind of thing?

16       A. There's continued training and review.  
17 We use the same manuals that the deputy  
18 registrars use. So the information that license  
19 control uses is available to the deputy  
20 registrar with intent so there's no  
21 miscommunication or no bad information hopefully  
22 being given out.

23           The training that license control has  
24 sometimes is, you know, periodic. The deputy

1 registrars themselves have annual meetings with  
2 the administrator and the staff at the BMV, the  
3 higher staff such as the registrar's office and  
4 our administrator Tom Wilson I mentioned  
5 earlier. They periodically have those  
6 trainings, but other than that, the license  
7 control, we train as we go.

8 Q. And have you as the director of license  
9 control received any particular training on  
10 immigration law or policies or immigration  
11 statuses?

12 A. No.

13 Q. What is a deputy registrar field  
14 representative?

15 A. Those are the individuals that are  
16 responsible for the evaluations of the deputy  
17 registrars to ensure that they are within the  
18 bounds of the policies that are out there,  
19 reviewing applications that are completed for  
20 the driver's license and other things that are  
21 completed at the deputy registrar, and they work  
22 with the deputy registrar themselves to attempt  
23 to ensure that they're being trained.

24 Q. None of those are in your department?

1 A. No.

2 Q. And would they go out into the field and  
3 actually be at --

4 A. That's the essence of their job, they're  
5 always in the field.

6 Q. And are there -- how many of those are  
7 there, if you know, approximately?

8 A. If I had to give an approximation -- we  
9 have four districts -- I would -- six to nine  
10 per district, and each deputy registrar field  
11 representative may have five deputy registrars  
12 or eight deputy registrars and they manage them  
13 as they go.

14 Q. And then what is a program  
15 administrator?

16 A. Program administrator is again a term  
17 that's used as a position classification across  
18 the BMV. It depends on where they're working,  
19 what their responsibilities are.

20 Q. What is a driver license examining  
21 supervisor?

22 A. I can't speak to that, but they manage  
23 the driver exam station, but their individual  
24 duties, I can't speak to that.

1 Q. You don't come across them in the course  
2 of your --

3 A. They may call license control for  
4 individual advice on -- you know, if a customer  
5 asks them a question about documentation, they  
6 may call us just to ask a question, but the  
7 individual responsibility for issuing that  
8 customer lies at the deputy registrar.

9 Q. And then what is a driver license  
10 station supervisor?

11 A. They -- each individual license exam  
12 station has a station supervisor, and other than  
13 that I can't speak to it.

14 Q. And a CDL field representative I'm  
15 guessing is similar to a deputy registrar field  
16 representative but dealing with CDL issues  
17 specifically?

18 A. CDL examinations.

19 Q. And state what CDL is again.

20 A. Commercial driver's license.

21 Q. And then what are investigative  
22 supervisors?

23 A. I can't speak to that. That was --  
24 that's in the investigation section. They have



1 all their own responsibilities.

2 Q. Do their responsibilities relate to  
3 things like fraud investigations and things like  
4 that?

5 A. I can't speak to their responsibilities.

6 Q. What about motor vehicle investigators,  
7 do you ever come across those?

8 A. We come across them, yes. If they have  
9 records -- if they have a record that needs to  
10 be updated for whatever that purpose may be  
11 after they've completed their investigation,  
12 they forward the information to us in license  
13 control, and we will essentially complete the  
14 task that they're asking for the record update  
15 that they're requesting.

16 Q. Which jobs in the BMV are appointed by  
17 the governor directly?

18 A. To my knowledge, administrator and  
19 above. By the governor directly? I am not sure  
20 what positions the governor appoints.

21 Q. How about this, which positions are  
22 considered political appointees that may change  
23 when the --

24 MR. HONEN: Objection. Outside the

1 scope.

2 (Court reporter interruption.)

3 Q. The question was which officials are  
4 considered political appointees. Let me ask  
5 this. When the new administration came in in  
6 this -- earlier this year in January how many  
7 people sort of at the top at the BMV would have  
8 changed?

9 A. What are you referring to at the top of  
10 the BMV?

11 Q. So like the registrar was new,  
12 obviously, we've already talked about that, but  
13 are there other officials that were replaced by  
14 the new governor or by someone else?

15 A. Not in my scope of knowledge.

16 Q. Not that you work with directly?

17 A. No.

18 Q. Your administrator didn't change?

19 A. No.

20 Q. What drafts -- so we talked a few  
21 minutes ago about the drafting of manuals like  
22 the deputy registrar manual and the Driver  
23 Manual, and you said that sometimes you're  
24 involved in the -- not necessarily in the

1 drafting, but you're sometimes involved in  
2 reviewing those. who are the people that are --  
3 that are generally involved in that process  
4 other than you?

5 A. My cohort Chad Adkins will review it and  
6 give his appropriate knowledge on the topic as  
7 well, and it passes through my supervisors, Mary  
8 Brunton and Michael Deschaine. It passes  
9 through the administrator Tom Wilson, and it  
10 goes to the registrar's office, and then we have  
11 an individual who updates that manual. So it  
12 passes just up through the chain of command for  
13 vision and oversight.

14 Q. When you say you have an individual that  
15 updates that manual, what do you mean?

16 A. We have a publications coordinator that  
17 whatever information we give her to have the  
18 manual updated she updates the manual.

19 Q. So she's the one that actually --

20 A. Yes.

21 Q. -- produces the --

22 A. Yeah. We don't -- sorry. I don't have  
23 access to update the manual exactly. She is the  
24 one that goes in and updates that manual as

1 necessary.

2 Q. Okay. Moving on to topic two.

3 MS. BROWN: This is Plaintiffs'  
4 Exhibit 2.

5 --0--

6 (Deposition Exhibit 2 marked.)

7 --0--

8 BY MS. BROWN:

9 Q. Have you seen this document before?

10 A. No.

11 Q. Okay. Are you familiar with the  
12 contracts that the deputy registrars sign with  
13 the BMVs -- sign with the BMV?

14 A. I'm familiar that they have contracts,  
15 yes.

16 Q. And you didn't review this in  
17 preparation for your deposition or when  
18 compiling the discovery --

19 A. No.

20 Q. -- responses? Okay.

21 So how are deputy registrars selected?

22 MR. HONEN: I'm just going to object to  
23 that as outside the scope of this particular  
24 case. Irrelevant. I guess I'm going to object

1 and state that it's irrelevant to the facts of  
2 this case, how deputy registrars are chosen.

3 MS. BROWN: Well, I'm trying to figure  
4 out how the contracts in terms of...

5 BY MS. BROWN:

6 Q. Let's turn to page 108. Do you know  
7 what department drafts the deputy registrar  
8 contracts?

9 A. There's not an individual department  
10 that does it. There's a group of people who  
11 gather to participate in the drafting of the  
12 contract.

13 Q. And are you involved in that process at  
14 all?

15 A. No.

16 Q. And are all the contracts for five  
17 years, do you know?

18 A. No.

19 Q. You don't know?

20 A. I know they're not.

21 Q. You know they're not all for five years.  
22 How is the time period determined?

23 A. I can't speak to that.

24 Q. And do all the contracts follow this

1 basic template that's in front of you as  
2 Exhibit 2?

3 A. I can't speak to that.

4 Q. So I'm going to direct your attention to  
5 page 108, section 2 that starts compliance with  
6 laws. If you could just read that paragraph.

7 A. (Witness complies.)

8 Q. And then the second paragraph below that  
9 that starts compliance requirements.

10 A. (Witness complies.)

11 Q. So deputy registrars, pursuant to the  
12 contract, are required to abide by Ohio law,  
13 correct?

14 A. Yes.

15 Q. And they're required to abide by and  
16 follow the deputy registrars manual and other  
17 directives from the BMV, correct?

18 A. Yes.

19 Q. And that would include requirements  
20 regarding the five elements needed to show,  
21 including legal presence?

22 A. Yes.

23 Q. And that would involve following the  
24 requirements for the -- that the BMV has set

1    forth regarding cosigner requirements for minors  
2    and who can be a cosigner?

3            A.    Yes.

4            Q.    If you could turn to page 117 where it  
5    states roster of employees and just read that  
6    sentence to yourself.

7            A.    (Witness complies.)

8                   Okay.

9            Q.    Do deputy registrars have to provide a  
10   roster at a certain date or a certain frequency?

11           A.    According to this paragraph, on a  
12   continuing basis.

13           Q.    Do you know what that means in practice?

14           A.    I can't speak to that requirement.

15           Q.    But there is a staff list that the BMV  
16   does possess of each of the deputy registrar's  
17   staffs?

18           A.    Yes, we have the roster for the staff,  
19   the current roster.

20                  MS. BROWN: This is Plaintiffs'  
21   Exhibit 3.

22                                  --0--

23                                  (Deposition Exhibit 3 marked.)

24                                  --0--

1 BY MS. BROWN:

2 Q. Have you seen this document before?

3 A. Yes.

4 Q. And if you could flip to the  
5 second-to-last page.

6 A. (Witness complies.)

7 Q. Did you sign the oath to discovery  
8 responses stating that you'd reviewed the  
9 interrogatories and requests for admission?

10 A. Yes.

11 Q. And that they're true to the best of  
12 your knowledge and belief?

13 A. Yes.

14 Q. We'll get into the interrogatories and  
15 requests for admission more later, but if you  
16 could turn to the second page of this document  
17 and look at request for production of documents  
18 five and seven.

19 A. (Witness complies.)

20 Q. So would it be accurate to state that  
21 the BMV does not have a personnel list for the  
22 deputy registrar located at 3481 East Broad  
23 Street?

24 A. We have the current roster. We don't



1 have the historical.

2 Q. Okay. What happens to the historical?

3 A. I can't speak to that. The roster's  
4 stored inside BASS, the database system. It's  
5 stored in there and it's just a current roster  
6 that's in there. I can't speak to what happens  
7 to the historical data.

8 Q. Okay. Going back to Exhibit 2,  
9 page 117, on the roster of employees, is this  
10 the only information that's provided, name,  
11 address, date of birth, home phone number, and  
12 working hours, or is any other information  
13 provided?

14 A. Without seeing it directly at the  
15 moment, I can't speak to it.

16 Q. Do you know if language capability is  
17 provided?

18 A. I can't speak to that.

19 Q. If you could look at the next paragraph  
20 on training.

21 A. (Witness complies.)

22 Q. In the last sentence it says,  
23 comprehensive training shall include, but not be  
24 limited to, mandatory BMV fraudulent document

1 training, new legislated or BMV-initiated  
2 processes and procedures training, and any other  
3 training determined by the BMV to be necessary  
4 for operating a deputy registrar license agency  
5 business.

6 Is this training that's referred to all  
7 performed by the deputy registrars themselves?

8 A. No. As I said earlier, there are  
9 roundtable trainings that happen where the  
10 administrator and registrar's office will speak  
11 to the deputy registrars in each district and  
12 give them updated information and give them  
13 periodic changes that may occur. Those happen,  
14 I believe, twice a year, and they give that  
15 training there.

16 And then there's also, you know,  
17 periodic revisions made to documents such as the  
18 manual, and we send out broadcasts advising them  
19 of the information. Other than that, the field  
20 representative will carry out and ensure that  
21 the deputy registrar's made aware. And then  
22 when it comes to the individual staff, they  
23 train them on the changes.

24 Q. So, for instance, the mandatory BMV

1 fraudulent document training, I assume that  
2 means mandatory for all deputy registrar staff?

3 A. Yes.

4 Q. Okay. And how often is that -- how  
5 often are employees required to take that, or is  
6 it just once?

7 A. I'm not speaking to the fraudulent  
8 document requirements. That was Todd.

9 Q. Okay. So you don't know?

10 A. I don't know the requirements.

11 Q. When it refers to new legislative or  
12 BMV-initiated process and procedures training,  
13 how often does that -- do those trainings get  
14 held, do you know?

15 A. I do not know.

16 Q. Would that be included in the  
17 twice-a-year roundtable?

18 A. Yes, as changes happen.

19 Q. Are the roundtables for all deputy  
20 registrars staff?

21 A. Yes.

22 Q. Not just the deputy registrar?

23 A. Oh, no. I'm sorry. You said staff.  
24 It's only for the deputy registrar themselves.

1 Q. On page 126 in the paragraph that starts  
2 entire contract, so could you read that first  
3 sentence.

4 A. (Witness complies.)

5 Q. So the deputy registrars are required to  
6 follow all Ohio laws and regulations and also  
7 follow the deputy registrar manual and any  
8 directives from the registrar, correct?

9 A. Yes.

10 Q. Can customers file complaints against a  
11 deputy registrar directly or with the BMV?

12 A. Are you asking if they can file  
13 complaints against the deputy registrar to the  
14 BMV?

15 Q. Either to the BMV or within the deputy  
16 registrar.

17 A. They can file complaints to the BMV.  
18 The individual deputy registrars, I can't speak  
19 to how they handle individual complaints.

20 Q. But there's a system within the BMV to  
21 receive complaints from deputy registrars?

22 A. Yes.

23 Q. Okay. And how are they tracked?

24 A. They have a system where they send the

1 information out to those field representatives  
2 and their supervisors and they work those  
3 complaints as appropriate.

4 Q. Okay. And does that ever result in a --  
5 let me rephrase. what kind of action could be  
6 taken by the BMV against a deputy registrar  
7 based on a complaint being filed?

8 A. I can't speak to that. I know if there  
9 are -- the complaints are worked and attempted  
10 to be made for the best resolution for the  
11 customer. Other than that I don't know the  
12 actions the BMV takes.

13 Q. Do you know of any instances where the  
14 BMV has taken a deputy registrar's contract away  
15 for any reason?

16 A. There are instances. I'm not privy to  
17 the knowledge of why it was done, but I know  
18 there have been instances where that has  
19 occurred.

20 Q. And the registrar signs all these  
21 contracts with the deputy registrars. Is that  
22 correct?

23 A. Yes.

24 Q. Moving on to topic three and switching

1 to page 111 of Exhibit 2, the initial training,  
2 do you know what the -- this initial training  
3 entails which is -- it says it's prescribed by  
4 the registrar prior to the opening of the  
5 agency?

6 A. I do not know.

7 Q. Do you know if it includes any training  
8 on legal presence documentation?

9 A. I know it includes training on the  
10 Deputy Registrar Procedure Manual. Other than  
11 that -- which is included in that manual.

12 Q. But you don't know what it focuses on  
13 within the manual?

14 A. No.

15 Q. Okay. Page 116. The section that  
16 starts personnel policy, is this a written  
17 document that the registrars -- I'm sorry, the  
18 deputy registrars are required to submit to the  
19 BMV?

20 A. I can't speak to that. I know they have  
21 their individual policies and they have their  
22 contracts. Other than that I'm not sure.

23 Q. Does the BMV give them like a sample or  
24 a template?

1           A. Contracts are provided on a template,  
2   but other than that...

3           Q. But you don't know whether there's a  
4   template offered for bullet points three or  
5   four, staff training?

6           A. I do not.

7           Q. Okay. So other than the twice-yearly  
8   roundtables that you mentioned a few minutes ago  
9   are there any other regular trainings offered by  
10   the BMV to deputy registrars and their staff?

11          A. Other than the fraudulent document  
12   training that's mentioned, not to my knowledge.

13          Q. Okay. And the fraudulent document  
14   training, Mr. Ballinger will testify to,  
15   correct?

16          A. Yes.

17          Q. So that's the only training that you  
18   know of that is offered to deputy registrars by  
19   the BMV directly?

20          A. Correct. That -- as I mentioned  
21   earlier, the field representative staff may have  
22   their individualized trainings that they offer  
23   to the deputy registrar, but I don't know  
24   individually if it's templated or if they create

1 their own products.

2 Q. Do you know if anyone at USCIS or any  
3 other federal agency participates in the  
4 roundtable trainings, the twice-yearly  
5 roundtable trainings?

6 A. They do not.

7 Q. They do not. Okay.

8 Any other outside trainers that come in,  
9 or is it all BMV staff?

10 A. I know there has been outside staff such  
11 as the Secretary of State staff presented at the  
12 most recent ones. It just depends on the topics  
13 they're covering.

14 Q. Are deputy registrars' staff required by  
15 the BMV to undergo any training regarding  
16 communicating with limited English proficient  
17 customers?

18 A. I can't speak to that.

19 Q. Do you know if the deputy registrars do  
20 any of that training on their own?

21 A. I know there are some deputy registrars  
22 that have bilingual employees. Other than that,  
23 that's all I know.

24 Q. And does the BMV require any particular



1 deputy registrars in areas with high  
2 concentrations of limited English proficient  
3 people to have bilingual employees?

4 A. According to the bilingual employees  
5 paragraph, it says that they shall make every  
6 reasonable effort to employ individuals. I  
7 don't see a requirement.

8 Q. Do you know what every reasonable effort  
9 might mean in this situation?

10 A. No.

11 Q. Do you know if the BMV has any policy on  
12 whether the customer has to provide their own  
13 interpreter if they're limited English  
14 proficient?

15 A. I don't know if it's a requirement. I  
16 know if they do have an interpreter, we make  
17 every reasonable effort to work with that  
18 interpreter and, you know, complete any testing  
19 that's required or translation of requirements  
20 for the five elements.

21 Q. When you say we, do you mean the deputy  
22 registrar's -- because the deputy registrar's  
23 staff are the ones that are actually  
24 communicating with them, right?

1           A. I mean -- when I say we, I mean license  
2     control, whenever we accept that call from the  
3     deputy registrar, we attempt to give the advice  
4     appropriate for -- from the BMV license control  
5     section to the deputy registrar on how to work  
6     with the interpreter provided by the customer,  
7     but they are the ones, yes, that are directly  
8     working with that interpreter.

9           Q. Do you know if a customer shows up  
10    without an interpreter and the deputy registrar  
11    doesn't have one, are they directed to call  
12    license control to ask what to do next?

13          A. When you say they, who.

14          Q. The deputy registrar.

15          A. The deputy registrar directing the  
16    customer to contact license control?

17          Q. Or is the deputy registrar staff  
18    supposed to call license control?

19          A. License control only speaks to deputy  
20    registrar staff.

21          Q. Okay. So is that an instance where a  
22    deputy registrar staff would be directed to call  
23    license control, if there's no interpreter on  
24    either side and the customer can't communicate

1 with the staff?

2 A. It may be -- the deputy registrar may  
3 attempt to handle it on their own, or the deputy  
4 registrar may advise their staff to call license  
5 control, yes.

6 Q. Does the -- what would license  
7 control -- what advice would license control  
8 offer in that situation?

9 A. We would advise them to work with the  
10 customer as much as they are able to. If the  
11 customer is unable to understand and there's no  
12 bilingual employee at the agency that's capable  
13 of understanding the language that is being  
14 spoken or if there is that language barrier,  
15 they may call the -- our general public line  
16 where they can discuss that information and  
17 attempt to find a resolution. As I mentioned,  
18 there's a complaint line that they may attempt  
19 to find a resolution through, or the deputy  
20 registrar will provide their own solution, but  
21 we wouldn't know if they don't contact us for  
22 that solution.

23 Q. Okay. So in that circumstance would you  
24 ever advise the deputy registrar to hire an

1 interpreter or call a language line of some sort  
2 to be able to facilitate that communication?

3 A. We would not advise them on anything  
4 related to that.

5 Q. Do you know if the BMV provides -- I'm  
6 sorry. Let me rephrase.

7 Does the BMV provide access to a  
8 language line for the deputy registrars?

9 A. I'm not sure.

10 Q. Do you know if any of the deputy  
11 registrars access one on their own?

12 A. I do not.

13 Q. Okay. Moving on to topic 14. Is there  
14 a job description for customer service manager?

15 A. There's a general position description,  
16 yes.

17 Q. Okay. And what does it say, roughly?

18 A. I can't speak to the exact language.

19 Q. That's fine.

20 A. But it does reference providing  
21 assistance to the customer service assistants,  
22 the staff personnel requirements and other  
23 requirements contained in the position  
24 description, but it's a generalized position

1 description that is out there provided by  
2 Department of Administrative Services.

3 Q. Okay. So your job description doesn't  
4 specifically mention your role as -- in license  
5 control and advising on acceptable documents and  
6 that kind of thing?

7 A. The application I filed for my position  
8 for the individual position number there may be  
9 language included in there related to USCIS and  
10 other information, but I can't recall that  
11 exactly.

12 Q. And do you know how long your particular  
13 position has existed?

14 A. No.

15 Q. You and Mr. Adkins, I think you  
16 testified earlier, are the only customer service  
17 managers who deal with providing assistance to  
18 deputy registrars about documentation  
19 requirements for noncitizens, correct?

20 A. Related to driver's license issuance,  
21 yes.

22 Q. As opposed to relating to CDLs and  
23 things like that?

24 A. If it's a CDL directly, if they're

1 attempting to be issued a CDL, we will still  
2 work with it. The CDL department is a very  
3 specialized section. When I say license  
4 issuance, specifically I refer to if a non-U.S.  
5 citizen is wishing to obtain vehicle  
6 registration or something like that, there are  
7 other departments who do that. We work directly  
8 with license issuance.

9 Q. And so what kinds of questions would  
10 other customer service managers besides you and  
11 Mr. Adkins be responsible for answering, like  
12 what kinds of subject areas?

13 A. There's all kind of sections within the  
14 BMV. There's, as I mentioned, the reinstatement  
15 section, the registration section, there's  
16 titles. I mean, every section that's contained  
17 in the BMV typically has a customer service  
18 manager.

19 Q. And I think you may have said this  
20 already, but do you only answer queries from the  
21 deputy registrars and not the public directly?

22 A. The customer service assistant twos  
23 answer questions directly from deputy  
24 registrars. There are questions from the public

1 that do come directly to myself or Chad as well  
2 as our customer service assistant three who we  
3 have two of those. They're lead workers. They  
4 may handle an inquiry from the public, but the  
5 general job is assisting deputy registrar staff.

6 Q. So what kind of inquiries directly from  
7 the public would you tend to get?

8 A. Any questions related to a driver's  
9 license, whether it's for non-U.S. citizens,  
10 whether it's U.S. citizens, driving on an  
11 international license, documentation  
12 requirements for U.S. citizens and non-U.S.  
13 citizens, anything pertaining to a license  
14 typically.

15 Q. Okay.

16 ==0==

17 (Deposition Exhibit 4 marked.)

18 ==0==

19 BY MS. BROWN:

20 Q. So on the second page, 1275, of  
21 Exhibit 4, it says License Control Help Desk,  
22 correct?

23 A. Yes.

24 Q. And then it has a phone number -- two

1 phone numbers, a fax number, and a click and  
2 chat option?

3 A. Yes.

4 Q. The top of this page it states these  
5 contacts are for deputy registrar use only,  
6 correct?

7 A. Yes.

8 Q. So this would be the lines that you  
9 receive phone calls directly from the deputy  
10 registrars?

11 A. Correct.

12 Q. Okay. What is the click and chat  
13 option?

14 A. It is an application that has been  
15 provided to the deputy registrars where they can  
16 inquire via chat instead of a phone call.

17 Q. And how often would you say the deputy  
18 registrars use that option as opposed to a phone  
19 call?

20 A. We receive approximately 20 to 25 chats  
21 a week in license control and that includes the  
22 deputy registrars across the state.

23 Q. So not very many?

24 A. No.



1 Q. And how many calls would you receive by  
2 comparison?

3 A. Estimated 400 a day, maybe.

4 Q. So turning back to the first page of  
5 Exhibit 4, which is Bates 1274, is this a list  
6 of public telephone numbers?

7 A. According to the top of the chart, yes.

8 Q. So you referred earlier to the fact that  
9 you guys do receive some calls directly from the  
10 public. Which line would you call from the  
11 public to get --

12 A. We don't receive calls directly from the  
13 public. There are inquiries that are made from  
14 the public. They're often relayed to us through  
15 the telecommunication section, which is -- if  
16 you look at the driver license/driver  
17 exam/compliance number, that 7600 number, that  
18 is the number available for customers to call.  
19 The 7500 number that's right below that as well,  
20 they may call that and forward the information  
21 from the customer up to us as well as email  
22 inquiries made through the BMV website.

23 Q. Okay. So you don't just answer a call  
24 directly from the public. You would receive

1 these inquiries through another means --

2 A. Correct.

3 Q. -- and then call them back?

4 A. Yes.

5 Q. And you mentioned that you get maybe 400  
6 calls a day. Is that what you said?

7 A. Approximately.

8 Q. And then some fairly small number of  
9 chats per week?

10 A. Correct.

11 Q. How often are these inquiries from the  
12 deputy registrars about documentation  
13 requirements for noncitizens?

14 A. It's give or take depending on however  
15 many customers enter the deputy registrars and  
16 they have questions. I can't give you a true  
17 estimation. Our call numbers fluctuate, you  
18 know, below, above 400, depending on time of  
19 year. The number fluctuates. I can't give you  
20 a true estimation to that.

21 Q. Do you think it would be less than half  
22 the calls are about --

23 A. If I were to say, I would assume less  
24 than half, just because --

1 Q. Less than a quarter?

2 A. The overall USCIS portion of our  
3 business versus how many phone calls we receive  
4 I can't give you a true estimation to.

5 Q. Okay. But it's a significant number of  
6 calls?

7 A. I mean, you'd have to define significant  
8 in relation to the number of calls.

9 Q. Do you have a system to track the  
10 subject of each call that comes in and when the  
11 call came in?

12 A. Every call should be logged in the  
13 telephone log that we have.

14 Q. And so what information is put in the  
15 telephone log?

16 A. The information included in the phone  
17 log should include the customer identifier if it  
18 is -- if they have an identifier. If they've  
19 been issued a license before, we'll capture the  
20 license number. If they have a Social Security  
21 number but don't have a license number, that may  
22 be captured as well just to identify that  
23 individual customer. If they don't have a  
24 social or license number, it gets kind of tricky

1 on how to identify them. We'll attempt to  
2 capture the name, and then we also capture the  
3 content of the call, whatever the individual  
4 question is. If we've given authorization to  
5 issuance, that should be captured as well, as  
6 well as any expiration dates on documents and  
7 individual documents the deputy registrar  
8 advises us that they've presented.

9 Q. And it will say which deputy registrar  
10 made the call?

11 A. Yeah. We capture that information as  
12 well.

13 Q. Is there -- when you say that you  
14 capture the content or the subject of what the  
15 call was about, would that be expressed in  
16 something like immigration related or noncitizen  
17 document question or something like that, or  
18 would it be different kinds of terms?

19 A. We would just typically type out the  
20 verbiage the deputy registrar uses for the  
21 question. If it's -- if they're asking what  
22 expiration date to use on the driver's license  
23 and they provide us with documents they have,  
24 you know, it may say something along the lines

1 of asking for expiration date, and then we'll  
2 put the expiration date in that we give them and  
3 that would be the content captured.

4 Q. Moving on to topic 15. And you can stay  
5 with that same exhibit. Do you know how long  
6 the license control department has existed?

7 A. I do not.

8 Q. And what is the purpose behind having  
9 the license control department?

10 A. Assist deputy registrars with issues,  
11 solutions, questions related to the license  
12 issuance process.

13 Q. Including documents required to get a  
14 license?

15 A. Anything related to a license issuance.

16 Q. Okay. And we mentioned the SAVE system  
17 earlier. Is license control the only point of  
18 contact for deputy registrars if they have an  
19 issue with SAVE?

20 A. If they have questions related to what  
21 to enter into SAVE, attempting to get the  
22 customer verified in SAVE, then yes, they'll  
23 contact license control. If there are system  
24 issues or they believe the system may not be

1 functioning because of a technological error or  
2 system outage, they'll contact another  
3 department, but any issues related to the  
4 documents for SAVE.

5 Q. So IT type of concerns would go to  
6 someone else --

7 A. Correct.

8 Q. -- but the other SAVE related questions  
9 go to you.

10 Okay. Turning to page 1276 of  
11 Exhibit 4, this document is entitled Deputy  
12 Registrar Help Desk Support. If I could direct  
13 you to the section on license control. If you  
14 could read that list of bullet points there.

15 A. (Witness complies.)

16 Q. And is this a comprehensive list of the  
17 types of issues that license control deals with?

18 A. Yes.

19 Q. So driver's license, out-of-state  
20 conversion issuance questions and procedures,  
21 you deal with that?

22 A. Yes.

23 Q. You deal with assistance determining  
24 acceptable documents for issuance?

1 A. Yes.

2 Q. Driver's license cosigner cancellations  
3 restored with a new cosigner?

4 A. Yes.

5 MS. BROWN: This is Plaintiffs'  
6 Exhibit 5.

7 ==0==

8 (Deposition Exhibit 5 marked.)

9 ==0==

10 BY MS. BROWN:

11 Q. Do you know what this document is?

12 A. Yes.

13 Q. What is it?

14 A. It is the drivers manual provided for  
15 the deputy registrars.

16 Q. And if you could turn to what is the  
17 second page of the document, but it's marked  
18 page 149. This is just a portion of the drivers  
19 manual. In part b ii c it says, was license  
20 control contacted for document approval. And  
21 then lays out fields to enter to record what  
22 document needed to be approved by license  
23 control and the name of the license control  
24 employee who approved the document. So what

1 does it means for license control to approve a  
2 document?

3 A. If they ask us if the document is  
4 acceptable for legal presence, if they contact  
5 us for expiration date information, if they  
6 contact us for if they can accept it, proof of a  
7 document for any of what you referred to earlier  
8 as the five elements, that was captured in there  
9 as well. Essentially anything license control  
10 approves is -- for license issuance related is  
11 captured in there.

12 Q. So if they have a question about whether  
13 a document is sufficient for showing legal  
14 presence and they call you and they approve it,  
15 they then are authorized to issue the license,  
16 assuming that everything else is okay with the  
17 application?

18 A. Yes.

19 Q. Okay. And so once you approve the  
20 document, is the deputy registrar then required  
21 to accept that document?

22 A. No. We give advice on selecting it.  
23 Typically the expectation is that they will  
24 issue that credential once we say yes. We don't



1 have knowledge of that application being  
2 completed at that point or not at that point.  
3 As we mentioned earlier, you know, they're  
4 required to follow the laws and procedures. And  
5 if we advise them, they should listen. However  
6 we won't be privy so it if they don't, I  
7 suppose.

8 Q. Okay. And what kind of reasons would  
9 they decide not to follow your advice?

10 A. They may have received different  
11 information from the field representative that  
12 we spoke about earlier, and they'll coordinate  
13 it with their field representative on how to  
14 proceed.

15 You know, they may ask us a question  
16 that differs from what they have been told by  
17 their field representative. So they'll consult  
18 with them immediately after the fact. So the  
19 license eventually should end up being issued.  
20 However, they may not do it immediately  
21 preceding as you mentioned. They may contact  
22 their field representative for further advice.

23 Q. So in some instances are the field  
24 representatives also responding to questions

1 about appropriate legal presence documentation?

2 A. Yes. If it's not directly related to a  
3 license issuance for a customer that's standing  
4 inside the deputy registrar, they contact their  
5 field representative.

6 Q. I see. Okay. So you're more for the  
7 quick response time if someone is actually in  
8 the -- in the -- on-site at the deputy  
9 registrar?

10 A. Yes.

11 Q. Do you have any idea how often the field  
12 representatives are in contact with legal  
13 presence documentation questions?

14 A. Not privy to that.

15 Q. Do you know if that information is  
16 tracked where the field representatives have to  
17 make a record of each type of call they receive?

18 A. I do not know if they are.

19 Q. And do the field representatives have  
20 training on legal presence documentation and  
21 immigration status and that kind of thing?

22 A. Upon their new hire since I have been in  
23 the position in license control I know that they  
24 have gone through the manuals. They are -- it's

1 included in their initial discussion that  
2 they're intended to read the manuals and be  
3 familiar with the knowledge contained in there.  
4 They will oftentimes sit in with license control  
5 to receive some training on how we handle phone  
6 calls and information related to that.

7           You know, they may ask us questions  
8 pertaining to legal presence and license  
9 issuance. It's not a formalized, we're going to  
10 sit down and give you a PowerPoint training, but  
11 there are documents out there available that I  
12 know that their management advises that they  
13 complete.

14       Q. Would they ever contact license control  
15 the same way that the deputy registrars contact  
16 you to ask --

17       A. They as in the field representatives?

18       Q. Yes.

19       A. Yes.

20       Q. And are those part of those 400 calls a  
21 day approximately that you get?

22       A. Yes.

23       Q. Okay. Has the frequency of calls that  
24 you get about documentation requirements or

1 driver's license issuance for noncitizens  
2 changed in the last year or so?

3 A. Yes. There was a substantial increase  
4 once central issuance was implemented, but that  
5 was mostly related to the requirements  
6 associated with SAVE.

7 Q. Okay. This is the change in July 2018  
8 that you referred to?

9 A. Yes.

10 Q. Before that had there been changes --  
11 either increasing or decreasing frequency of  
12 those types of calls in the last, say, three  
13 years?

14 A. I can't speak to the general number. I  
15 took -- I've been with license control since  
16 June of 2016, as I mentioned earlier, and got  
17 promoted to the manager in 2018, and the call  
18 volume was steady, and then once central  
19 issuance, it increased. Other than that that's  
20 the only increase I'm aware of.

21 Q. And when you said you think the calls  
22 went up due to changes in SAVE, can you explain  
23 what you mean by that?

24 A. The changes in SAVE were implemented for

1 any individual who is applying for a driver's  
2 license. Once the deputy registrar begins that  
3 application, all non-U.S. citizens that have  
4 been issued USCIS documentation and U.S.  
5 citizens who have been issued documentation from  
6 USCIS or their successor agencies go through  
7 SAVE verification.

8 Q. Okay. What was the policy before?

9 A. Prior to July of 2018 we verified  
10 employment cards for individuals depending on  
11 the category of the card.

12 Q. Okay. So not everybody had to go  
13 through -- not all noncitizens went through SAVE  
14 before and now they all do?

15 A. Correct.

16 Q. Refugees went through already before?

17 A. No.

18 Q. They did not?

19 A. They did not.

20 Q. So before July 2018 refugees did not get  
21 verified through SAVE?

22 A. Correct.

23 Q. When you're receiving these calls from  
24 deputy registrars asking for document approval

1 and answering other questions, does license  
2 control ever direct the deputy registrars to  
3 hold onto a customer's documents?

4 A. We do not. License control will not  
5 advise on holding onto documents.

6 Q. Would that be something that would go to  
7 the investigations unit?

8 A. Yes.

9 Q. Okay. So there's no circumstances under  
10 which license control would say hold the  
11 person's documents and tell them to leave?

12 A. Correct. We have no procedures that  
13 advise to do such.

14 Q. Do you know of any situations where the  
15 field representatives and license control gave  
16 differing guidance to deputy registrars on  
17 licensing -- license issuance for a noncitizen?

18 A. I can't speak to any exact moments, but  
19 I'm sure there have been.

20 Q. And if there were, would it just be up  
21 to the deputy registrar to decide what to do?

22 A. If there are, then it gets escalated up  
23 through the chain of command. The deputy  
24 registrar field representatives, they have their

1 own managers, their own assistant chiefs and  
2 chiefs, as well as license control, we have an  
3 assistant chief and chief, and we all report to  
4 the same administrator. If there's a conflict  
5 in advice that's been given, it gets escalated  
6 up through, and the administrator oftentimes  
7 will handle that information.

8 Q. What person is in charge of all of the  
9 field representatives? Who's the head of that  
10 department or section?

11 A. The field representatives -- each  
12 district has their own person that's in charge  
13 of their district so they have a district chief.

14 Q. And there's four districts?

15 A. Correct. So each district has their own  
16 district chief, and the administrator is in  
17 charge of all those district chiefs.

18 Q. And who's that person?

19 A. Tom Wilson, the administrator I  
20 mentioned earlier.

21 Q. Okay. Moving on to topic four. How  
22 does the BMV generally communicate policy  
23 changes or directives to the deputy registrar?

24 A. They are oftentimes put out in the

1 manual, and then the manual updates are  
2 complemented with what we call a broadcast that  
3 is sent out to all the deputy registrars and the  
4 employees. Any time an employee logs into the  
5 BASS system once a broadcast has been  
6 distributed, they -- it says a broadcast has  
7 been sent, and the intention is that they review  
8 the broadcast, and then that manual update and  
9 the broadcast will show and say this section has  
10 been updated, and that's oftentimes the most  
11 effective communication.

12 Q. Okay. And so any time there's any  
13 change at all in one of the manual -- the Driver  
14 Manual or the Deputy Registrar Procedure Manual  
15 would a broadcast be issued?

16 A. That's the intent, yes.

17 Q. It doesn't always happen?

18 A. To my knowledge, it happens. I don't  
19 handle that so I can't speak to it, but the  
20 intent is that one's sent every time.

21 Q. And what format would the broadcast be  
22 in? Is it like a memo, a few short paragraphs,  
23 that kind of thing?

24 A. It's in a memo format typically.



1 Q. And it would reference the section of  
2 the manual that's been changed?

3 A. Yes.

4 Q. Okay. And how would the actual updated  
5 version of the manual get transmitted to the  
6 deputy registrars?

7 A. In the file that's contained inside of  
8 the BASS system the manual just gets updated as  
9 that PDF and uploaded into BASS where they can  
10 access that as it changes and review that  
11 section appropriately.

12 Q. We talked about how sometimes deputy  
13 registrars contact their field representatives,  
14 and sometimes they contact license control, and  
15 you mentioned that one distinction between which  
16 of those two options they're supposed to follow  
17 is whether the customer is right there in the  
18 building -- in the deputy registrar's building  
19 versus maybe they're not, it's not an immediate  
20 issue. Is that correct?

21 A. Yes.

22 Q. Okay. Is there any other reason why  
23 they -- the deputy registrar would be instructed  
24 to call you versus a field rep?

1           A. Not to my knowledge.

2           Q. Okay. So there's no policy or directive  
3 from the BMV stating that they should call you  
4 for one reason and the field reps for another  
5 reason?

6           A. No. We advise them to call their field  
7 rep if the customer's not in the agency, because  
8 we don't want to give advice on documents that  
9 aren't present in the moment in case there is a  
10 situation where that individual brings in  
11 different documents that weren't spoken about  
12 directly to us.

13          Q. So if a deputy registrar has a customer  
14 standing in front of them with documents that  
15 they've presented to show legal presence and  
16 then they give you a call, is there a way for  
17 you to actually see those documents? How does  
18 that work?

19          A. If there is a request for the documents  
20 to be seen, they'll fax them in to us.

21          Q. Okay. And that -- so that sort of  
22 happens instantaneously then, you would get the  
23 fax right away, and be able to stay on the phone  
24 and give them advice?

1           A. As fast as we can receive the fax.  
2 oftentimes we don't keep them on the phone,  
3 we'll let them know we'll call them back due to  
4 the nature of how long it takes to receive a  
5 fax.

6           Q. Okay. But in that instance the customer  
7 would wait in the deputy registrar while the  
8 issue was attempted to be resolved?

9           A. Typically, yes.

10          Q. We're going to move on to topic five.

11                               --0--

12                       (Deposition Exhibit 6 marked.)

13                               --0--

14 BY MS. BROWN:

15          Q. So this is a portion of the Deputy  
16 Registrar Procedure Manual in the Proof of  
17 Identity section which was provided to the  
18 Plaintiffs in discovery. Are you familiar with  
19 this Proof of Identity section of the manual?

20          A. Yes.

21          Q. If you could turn to the second page of  
22 this document, which is page 477 or page 5,  
23 depending on which numbering system, but  
24 Exhibit 6. So in table 1.1 under serving as a

1 cosigner it states that a cosigner must provide  
2 Ohio credential or proof of the five elements.

3 Can you state what the five elements are?

4 A. It is proof of name, proof of date of  
5 birth, proof of legal presence, proof of social  
6 security number, proof of street address.

7 Q. And those are the five elements that a  
8 customer must show to get a driver's license,  
9 right?

10 A. For their initial application, yes.

11 Q. And then it says if a non-Ohio resident,  
12 out-of-state credential and proof of social  
13 security number?

14 A. Yes.

15 Q. Okay. Would any out-of-state credential  
16 suffice for that?

17 A. Yes.

18 Q. So even if it's a state that issues  
19 licenses to people that don't have valid  
20 immigration status?

21 A. Yes.

22 Q. Okay. Directly below that where it  
23 says, scan cosigner's identity documents only  
24 when minor is being issued a compliant

1 credential. Does that refer to the new  
2 compliant credentials that came out last year?

3 A. Yes.

4 Q. In July 2018?

5 A. Yes.

6 Q. And what does it mean? What does  
7 compliant credential mean?

8 A. Compliant credential means it's a  
9 credential that's been issued in accordance with  
10 the Real ID Act.

11 Q. And the Real ID Act itself doesn't  
12 contain anything about cosigner requirements for  
13 minors specifically, right?

14 A. Correct.

15 Q. So the Real ID Act isn't the basis for  
16 BMV's requirements for cosigners to present  
17 certain legal presence documents?

18 A. I'm sorry. Can you repeat that?

19 Q. The Real ID Act isn't the basis for  
20 BMV's requirements for cosigners to present  
21 certain legal presence documents?

22 A. Correct.

23 Q. So to return to the language here that  
24 starts, scan cosigner's identity documents, why

1 is an identity document only required to be  
2 scanned when the minor is being issued a  
3 compliant credential as opposed to a standard  
4 credential?

5 A. I can't speak to the creation of that  
6 policy.

7 Q. You don't know the purpose --

8 A. No.

9 Q. -- of why that is? Okay.

10 If you could return to the -- turn to  
11 the previous page of Exhibit 6. So this is also  
12 still for required documents for U.S. citizens.  
13 For a first credential issuance to get a  
14 compliant license you need proof of the five  
15 elements. Is that correct?

16 A. Yes.

17 Q. Okay. And then flipping back to the  
18 next page for a cosigner you need an Ohio  
19 credential or proof of the five elements, right?

20 A. Or if they have an out-of-state  
21 credential.

22 Q. Okay. So the requirements are slightly  
23 different for being a cosigner versus getting  
24 your own license, getting your own first

1 credential?

2 A. I'm not sure what you mean.

3 Q. So I'm just trying to get at the  
4 difference here. So the first credential  
5 issuance the requirement is proof of the five  
6 elements, correct?

7 A. Correct.

8 Q. And then to serve as a cosigner you have  
9 to have an Ohio credential or proof of the five  
10 elements, right?

11 A. Correct.

12 Q. So there's two different options?

13 A. Yes.

14 Q. Okay. Turning to 479 of Exhibit 6, the  
15 requirements for a standard issuance for  
16 temporary residents for the first credential is  
17 what?

18 A. Proof of the five elements.

19 Q. And then on the next page of Exhibit 6  
20 for serving as a cosigner for a temporary  
21 resident, what's the requirement?

22 A. Ohio credential or proof of five  
23 elements, or if not Ohio resident, out-of-state  
24 credential or proof of -- and proof of SSN.

1 Q. So the requirements for serving as a  
2 cosigner if you're a temporary resident are a  
3 little bit different than getting your own first  
4 credential, correct?

5 A. Yes.

6 Q. Okay. When it says scan identity  
7 documents, could you explain what that means?  
8 where do you scan it? where does it go?

9 A. In the BASS system they have the  
10 capabilities of scanning documents, and they are  
11 scanned in through their scanner at the deputy  
12 registrar and maintained inside of the BASS  
13 application.

14 Q. Okay. So then that's -- a copy of that  
15 identification stays in the BASS system where  
16 it's available to the BMV at that point?

17 A. Yes.

18 Q. It's not destroyed at any point if  
19 there's no process for that?

20 A. There's a retention policy, but other  
21 than that.

22 MS. BROWN: Exhibit 7.

23 ==0==

24 (Deposition Exhibit 7 marked.)



2 BY MS. BROWN:

14 Do you see that?

15           A.    Yes.

19 A. Yes.

23                      A.    No.

24 Q. It's just sort of if the deputy

1 registrar hasn't seen it before or thinks it  
2 looks fraudulent or what any...

3 A. Questionable in this context would  
4 mean -- you know, the fraudulent document  
5 procedure is its own procedure which I can't  
6 speak to. Questionable in this context is if  
7 the information on those documents, you know,  
8 are not understood by the deputy registrar,  
9 whether it be what that legal presence is or  
10 what documents are required for that legal  
11 presence type that they're indicating the  
12 applicant has, then they call us with questions  
13 regarding said questionable document.

14 Q. Okay. So there's not a list of  
15 documents that are considered like inherently  
16 questionable where you would have to look at  
17 them?

18 A. No.

19 (Recess taken.)

20 BY MS. BROWN:

21 Q. So we're on topic six now.

22 MS. BROWN: Plaintiffs' Exhibit 8.

23 ==0==

24 (Deposition Exhibit 8 marked.)

2 BY MS. BROWN:

7 A. Yes.

12           A. A Form I-797 is issued by USCIS most  
13       commonly as a notice of action to communicate  
14       with the individual for many different reasons,  
15       such as approval of an application or petition,  
16       or as a replacement Form I-94.

19           A. If individuals lose their I-94, they may  
20    apply through USCIS for a replacement. So they  
21    have a certain case type that may give them the  
22    new I-94. So once they apply for the  
23    replacement, they get it and it's oftentimes  
24    attached to I-797.

1 Q. Okay. And is that known as an I-797A,  
2 the replacement I-94 form?

3 A. According to this, it's referred to as  
4 an I-797, but the actual form may be an I-797A  
5 if it is indeed a notice of approval.

6 Q. When you say it's referred to as an  
7 I-797, you just mean it's referred to by the BMV  
8 in this manual?

9 A. Yes.

10 Q. Okay. Turning to page 530 of Exhibit 8,  
11 this section discusses Form I-94, correct?

12 A. Yes.

13 Q. Okay. What is a refugee?

14 A. I don't have the legal definition in  
15 front of me so I can't speak to the true  
16 definition of it.

17 Q. If a refugee is -- has an I-94 that's  
18 marked DS, do you know what that stands for, DS?

19 A. Yes.

20 Q. What?

21 A. It is duration of status or duration of  
22 stay.

23 Q. Duration of status?

24 A. Yes.

1 Q. And if a refugee has an I-94 that is  
2 marked DS for duration of status, how long are  
3 they permitted to be in the U.S.?

4 A. I don't have the legal definition in  
5 front of me, but according to DS, it's for the  
6 duration that they hold the status. I don't  
7 know what the legal definition of it is.

8 Q. Okay. And how do refugees show proof  
9 that they are refugees through documentation?

10 A. They present an I-94 oftentimes.

11 Q. What is the difference between a refugee  
12 and an asylee?

13 A. I, again, don't have the legal  
14 definitions in front of me so I can't speak to  
15 it. Documentation-wise that we see at the BMV,  
16 one presents an I-94 that says that they're a  
17 refugee, admitted as a refugee pursuant to the  
18 associated federal code, and the other one  
19 presents an I-94 that says they've been admitted  
20 as an asylee.

21 Q. In your own words, what do you think the  
22 difference between a refugee and an asylee is  
23 even if you don't have the legal definition?

24 A. A refugee has been admitted to the U.S.

1 under the -- I guess the contents of the refugee  
2 admittance process through the federal  
3 government, and asylum is often granted to  
4 individuals who may be seeking political asylum,  
5 personal asylum for other issues associated with  
6 themselves.

7 Q. And do you know how long asylees are  
8 allowed to be in the U.S.?

9 A. I can't speak to the federal. I  
10 understand that it is indefinitely if that's  
11 what the document states which I assume holds  
12 true for refugees as well. There's no -- for  
13 our purposes, there may be an expiration date  
14 listed on the document, and that's the day we  
15 use if it's listed on there.

16 Q. And what is a parolee?

17 A. I don't know the legal definition of  
18 that, either.

19 Q. Okay. Turning to -- actually we're  
20 already on page 530 of Exhibit 8. What is an  
21 I-94?

22 A. It states, according to the Proof of  
23 Identity manual, it's the paper arrival and  
24 departure record issued by the Department of

1 Homeland Security to foreign visitors entering  
2 the United States.

3 Q. Do you see the figure 4-2 at the bottom?

4 A. Yes.

5 Q. Is this the only type of I-94 you've  
6 seen?

7 A. No. This says it's just a sample image  
8 of an I-94.

9 Q. Have you also seen electronic I-94s?

10 A. Yes.

11 Q. And they look a little different than  
12 this?

13 A. Yes.

14 Q. Okay. So earlier you testified about  
15 the training that deputy registrars get  
16 essentially being the manual and they're  
17 supposed to sort of learn this -- learn  
18 information about immigration-related issues and  
19 documents through the manual. Is that correct?

20 A. Yes.

21 Q. Okay. So do they get trained on how to  
22 recognize what an I-94 looks like, how to  
23 distinguish among different types of immigration  
24 documents and that kind of thing?

1           A. They may. Again, I can't speak to the  
2 individual training that they receive from the  
3 deputy registrar, speaking of the staff. I can  
4 speak to the roundtables where they give new  
5 updated information, but that's all I can speak  
6 to.

7           Q. But there's not like a training where  
8 they would seek sample copies of all of the  
9 documents and what they look like, like  
10 employment authorization document or an I-94 or  
11 green card or things like that?

12          A. I can't speak to if they do or don't.

13          Q. When you say you can't speak, you mean  
14 you don't know?

15          A. For the deputy registrars, yes. I don't  
16 know if the deputy registrars see copies of  
17 other documents to train their staff.

18          Q. Okay. And then turning to the next  
19 page, 531, so if a refugee presents an I-94 as  
20 their sole legal presence document, it must be  
21 unexpired, correct?

22          A. Correct.

23          Q. And unexpired here is defined as like  
24 having an expiration date that has not yet



1 passed, correct?

2 A. Correct.

3 Q. So one that is marked duration of status  
4 would also be unexpired?

5 A. Correct.

6 Q. In the table where it says -- in the  
7 second column down -- or the second row down, an  
8 I-94 refugee stamp that is less than two years  
9 old can be the sole legal presence document,  
10 correct?

11 A. Correct.

12 Q. That's the current BMV policy?

13 A. Yes.

14 Q. And those applicants are issued a  
15 four-year license?

16 A. Yes.

17 Q. And have they -- has that been the  
18 policy that they receive a four-year license for  
19 a long time or is that a new --

20 A. I can't speak to the duration. Since  
21 I've been here, it's been the policy --

22 Q. You don't know --

23 A. -- since June of 2016. Other than that  
24 I can't speak to it.

1 Q. Okay. The next row down if someone  
2 presents an -- if someone presents -- I'm sorry.

3 Two more rows down, so the fourth row  
4 down -- the third row down, I-94 with indefinite  
5 refugee stamp over two years old, does that  
6 indefinite refer to one that's marked duration  
7 of status?

8 A. No. It refers to a stamp that's  
9 oftentimes a square stamp with blue ink or black  
10 ink that indicates the refugee's admitted  
11 indefinitely pursuant to the appropriate section  
12 of the federal code. They may or may not have  
13 an expiration date listed in there, but if it  
14 says indefinite, then it means indefinite.

15 Q. Okay. If a refugee is marked -- if an  
16 I-94 is marked as duration of status, which row  
17 will it fall under here?

18 A. Dependent upon the appropriate section  
19 contained in here. If it says that it's been  
20 stamped within two years, it will fall under row  
21 two. If it's over two years old, then it will  
22 fall within row three.

23 Q. So it will fall in that indefinite  
24 category one way or the other?

1           A.   Yes.  They're both labeled indefinite.

2           Q.   So in the third row what does it say  
3   under requirements and BASS entries for the  
4   third row?

5           A.   So in the third row it says, in BASS,  
6   select "PPR" as the document and enter four  
7   birthdays from the current date as the  
8   expiration date.

9           Q.   So in other words, the I-94, if the I-94  
10   is dated more than two years ago, cannot be the  
11   sole legal presence document for a refugee.  
12   They would also need to present what the BMV  
13   calls an I-797 with case type I-485, correct?

14          A.   Yes.

15          Q.   And they would receive a four-year  
16   license?

17          A.   Yes.

18          Q.   What does PPR stand for?

19          A.   Pending permit residency.

20          Q.   And that means that they have applied  
21   for permanent residency?

22          A.   It means per -- what the case I-485 is,  
23   it means they've applied for adjustment of  
24   status which oftentimes will warrant them

1 permanent resident status, yes.

2 Q. And moving down the chart to the row  
3 that says I-94 with indefinite asylum stamp. Do  
4 you see that?

5 A. Yes.

6 Q. So if an asylee has an I-94 that's  
7 indefinite, the applicant does not need to  
8 present any other legal presence documents,  
9 right?

10 A. Correct.

11 Q. And then going up two rows, an I-94 with  
12 an indefinite parolee stamp, the applicant  
13 doesn't need to present any additional legal  
14 presence documents, correct?

15 A. Correct.

16 Q. Flipping back to page 529 of Exhibit 8,  
17 this table deals with I-797 case type  
18 requirements as you can see at the top. Could  
19 you read the requirements and BASS entries for  
20 I-797 case type 485.

21 A. Yes. It says, also needs an unexpired  
22 passport, visa which can be expired, and I-94  
23 which can be expired. In BASS, select "PPR" as  
24 document and enter four birthdays from the

1 current date as the expiration date.

2 Q. And what is the basis for the  
3 requirement that if you present an I-797 for an  
4 I-485, which is adjustment of status as you  
5 said, also needs an unexpired passport, visa,  
6 and I-94?

7 A. I can't speak to that policy. It's been  
8 in place prior to myself or the current  
9 administration.

10 Q. So you don't know the basis?

11 A. No.

12 Q. And these requirements, though, do not  
13 apply to refugees. Is that correct?

14 A. If they have the I-94 refugee that  
15 they're presenting, then no, but if they don't  
16 present us with the I-94 refugee, then we can't  
17 know that they're refugee or not, so then it  
18 would apply to them.

19 Q. Okay. But if they do have their I-94,  
20 they don't need to show an unexpired passport or  
21 a visa?

22 A. Correct.

23 Q. They don't even get a Visa, correct?

24 A. If that's how federal immigration laws

1 handle it, yes.

2 Q. So going back to page 531 of Exhibit 8,  
3 and again, I want to look at the third row down  
4 where the requirement is stated that an I-94  
5 with indefinite refugee stamp over two years old  
6 needs an I-797 with case type I-485. Refugees  
7 are one of the categories of noncitizens that  
8 the Real ID Act permits states to grant driver's  
9 licenses to, correct?

10 A. Say that again. I'm sorry.

11 Q. Let me ask it this way. Are refugees  
12 one of the categories of noncitizens that the  
13 Real ID Act permits states to grant licenses to?

14 A. I don't have the Real ID Act in front of  
15 me, but if it's contained in there, then  
16 assumably so.

17 Q. And the Real ID Act doesn't limit  
18 refugee eligibility based on the number of years  
19 they've been a refugee, correct?

20 A. I don't have the Real ID Act in front of  
21 me, so I can't speak to that.

22 Q. What is the basis for the BMV's  
23 requirement in row three on page 531 of  
24 Exhibit 8?

1           A. Again, that policy was in place prior to  
2 myself or the current administration so I can't  
3 speak to the basis of that policy.

4           Q. You don't know why this policy was  
5 enacted?

6           A. No.

7           Q. No one has ever explained to you why  
8 it's necessary to have an additional requirement  
9 if the refugee stamp is over two years old?

10          A. No.

11          Q. And you know that's the basis of this  
12 lawsuit, right?

13          A. Yes.

14          Q. Okay. But you've never had a  
15 conversation with anyone in the BMV about why  
16 this policy exists?

17               MR. HONEN: Objection. Asked and  
18 answered.

19          Q. Is there someone else at the BMV who  
20 might know the basis for this -- for this  
21 policy?

22          A. As I stated, I spoke with the  
23 administration, including the registrar's office  
24 and my current administrator. They were not

1 here when that procedure was put in place so  
2 we're not aware of why that policy is there.

3 Q. And none -- in any of those  
4 conversations nobody expressed any justification  
5 or articulated any basis for why such a policy  
6 should exist?

7 A. No one knows the basis of that policy.

8 Q. So no one at the BMV knows the basis of  
9 this policy?

10 A. As I stated, no.

11 --0--

12 (Deposition Exhibits 9-10 marked.)

13 --0--

14 BY MS. BROWN:

15 Q. Looking at these exhibits together, 9  
16 and 10, can you read the title at the top of  
17 Exhibit 9 first out loud?

18 A. Says Form I-797C, Notice of Action.

19 Q. And then the top of form -- the top of  
20 Exhibit 10.

21 A. It says I-797, Notice of Action.

22 Q. And who issues this document, Exhibit 9?

23 A. According to the top left border, it  
24 says Department of Homeland Security U.S.



1     Citizenship and Immigration Services.

2           Q.   And Exhibit 10?

3           A.   Department of Homeland Security U.S.

4     Citizenship and Immigration Services.

5           Q.   So these are two different forms,  
6     correct?

7           A.   Yes.

8           Q.   And under notice type can you find where  
9     it says notice type on each of the two forms?

10          A.   Yes.

11          Q.   Okay.  On the first one, Exhibit 9, what  
12     does it say the notice type is?

13          A.   Receipt.

14          Q.   And on the second one it's in a slightly  
15     different spot, but what does it say notice type  
16     is?

17          A.   Approval notice.

18          Q.   So these forms appear to have different  
19     purposes then?

20          A.   Yes.

21          Q.   Okay.  What do you think a receipt  
22     notice is versus an approval notice?

23          A.   Receipt means they paid for something so  
24     they're getting this receipt in return.

1 Q. The BMV's manuals refer to an I-797 at  
2 various points, correct?

3 A. Yes.

4 Q. Do they ever refer to an I-797C that you  
5 know of?

6 A. Not that I recall.

7 Q. So the drivers manual states that the  
8 BMV accepts a receipt notice, a fee waiver  
9 notice, and an approval notice, correct?

10 A. Yes.

11 Q. Okay. Do you know why they accept those  
12 types of notices but not all types of different  
13 variations of I-797s, I-797As, Bs, Cs, Ds?

14 A. I do not.

15 Q. So you've never had occasion to learn  
16 about the difference between the various forms?

17 A. USCIS obviously defines the forms, and I  
18 see them often. The individual who made the  
19 decision to accept what forms is not here. You  
20 know, we provided the forms appropriate to --  
21 that USCIS has, and the decision was made to do  
22 that.

23 Q. Who is that person?

24 A. It's -- John Golden is his name. He's

1     retired.

2           Q.   And he was a compliance officer previous  
3     to his retirement?

4           A.   I don't know if that was his official  
5     title.

6           Q.   In-house counsel?

7           A.   I don't know his official title.

8           Q.   He worked for the BMV?

9           A.   Yes.

10          Q.   He was a BMV employee.

11                Okay.  So are you aware of whether the  
12   BMV will accept for a refugee with an I-94 over  
13   two years an I-797A?

14          A.   If they have been granted an approval  
15   notice with appropriate case type as identified  
16   in the Proof of Identity manual, then yes.

17          Q.   But an I-797A is not an approval notice,  
18   correct?

19          A.   No.  That's an I-797.

20          Q.   So do you know if they accept an I-797A?

21          A.   If it's not identified as an acceptable  
22   notice type, then no.

23          Q.   Do you know if they accept an I-797B?

24          A.   If it's not an acceptable notice type,

1 then no.

2 Q. Do you know if they would accept an  
3 I-797C for biometric notice?

4 A. We would not. It's not been identified  
5 as an acceptable notice type.

6 Q. What about I-797C for transfer of files?

7 A. If it's not an identified accepted  
8 notice type, then no.

9 Q. And I-797 rejection of application?

10 A. If it's not an identified acceptable  
11 notice type, then no.

12 Q. An I-797 interview or rescheduled  
13 appointments?

14 A. If it's not an identified acceptable  
15 notice type, then no.

16 Q. And an I-797C to reopen cases?

17 A. If it's not an identified acceptable  
18 notice type, then no.

19 Q. So the acceptable notices as stated in  
20 the manual are only a receipt notice, fee waiver  
21 notice, and approval notice, correct?

22 A. I don't have it in front of me, but I  
23 believe so.

24 Q. So only those are accepted?

1           A.   Yes.

2                   MS. BROWN:   Exhibit 11.

3                               --0--

4                   (Deposition Exhibit 11 marked.)

5                               --0--

6   BY MS. BROWN:

7           Q.   And just like the other set of discovery  
8   responses that we looked at for IJPC V. Norman,  
9   these are the discovery responses in CRIS V.  
10   Norman. And on the second-to-last page is that  
11   your signature?

12          A.   Yes.

13          Q.   Okay. So you swore that the foregoing  
14   answers to the interrogatories and requests for  
15   admission are true to the best of your knowledge  
16   and belief, correct?

17          A.   Yes.

18          Q.   Okay. And you reviewed all of the  
19   answers before signing this, I assume?

20          A.   Yes.

21          Q.   Okay. Could you turn to request for  
22   admission six. It actually says 56, but I  
23   believe it's a typo.

24          A.   (Witness complies.)

1 Q. It's one page before your signature.

2 Page 10 of Exhibit 11. And I'm sorry we're --  
3 this is topic seven now. I'm sorry. This is  
4 still topic six.

5 Can you explain why you denied this  
6 request for admission?

7 A. It says, the Proof of Identity section  
8 of the manual provided in response to question  
9 12 contains that information.

10 Q. Right. But why did you deny it?

11 So the question was admit that if a  
12 refugee applicant presents an I-94 as proof of  
13 legal presence and the I-94 is more than two  
14 years old with no expiration date, the BMV  
15 permits deputy registrars to issue a license  
16 only if the applicant also presents a Form I-797  
17 with case type I-485. So why is that not true?

18 A. That is a deny, because if the applicant  
19 has additional documentation such as an  
20 employment authorization card that is current  
21 and valid, then they can be issued. So if they  
22 have an employment -- an I-766 is what I  
23 referred to as an employment authorization card.  
24 They may be issued. Or if they have applied for

1 and obtained other additional legal presence  
2 status then we will issue them a license.

3 Q. So if it read admit that if a refugee  
4 applicant presents only an I-94, if we added  
5 that word only after presents, then would it be  
6 accurate if they didn't present an EAD or some  
7 other -- employment authorization document -- or  
8 some other --

9 A. That would hold true only if it's that  
10 current time where they contain the  
11 documentation, but if they come back and return  
12 to the deputy registrar with additional  
13 documents, then no, because you're saying that  
14 if the argument says if they present only --  
15 yes, if they only present it at that time, yes,  
16 but if they return with additional  
17 documentation, then if it's appropriate legal  
18 presence they may issue it.

19 Q. Okay. Moving on to topic eight.

20 ==0==

21 (Deposition Exhibit 12 marked.)

22 ==0==

23 MS. BROWN: This is Plaintiffs'  
24 Exhibit 12.

1 BY MS. BROWN:

2 Q. This is a portion of the drivers manual,  
3 correct?

4 A. Yes.

5 Q. Okay. Here is -- I want to direct your  
6 attention to section D, Cosigner/Emancipated  
7 Minor Information, page 126. What documentation  
8 is required, if any, to show emancipation of a  
9 minor?

10 A. The documentation issued to them through  
11 the court system or other appropriate documents  
12 that indicate they're legally an emancipated  
13 minor.

14 Q. Okay. Is there an official court  
15 proceeding to become an emancipated minor?

16 A. There may or may not be. I don't know  
17 that exact answer.

18 Q. So what would the other appropriate  
19 documentation be?

20 A. The emancipated minor, we don't see it  
21 very often, and they're all evaluated on a  
22 case-by-case basis. There's no identified, you  
23 know, only these two documents are accepted for  
24 an emancipated minor.



1           Q. So for instance it could be like a  
2 marriage license if it's a minor who's already  
3 married?

4           A. Again --

5           Q. Or marriage certificate.

6           A. -- it's all evaluated on a case-by-case  
7 basis.

8           Q. Can a minor ever be considered  
9 emancipated and apply for a license as such  
10 without any documentation, but with just their  
11 attestation?

12          A. No. They require documentation.

13          Q. And I think we covered this before, but  
14 in section D 1 b, a cosigner who is not an Ohio  
15 resident may present an out-of-state credential  
16 and proof of Social Security number as proof of  
17 identity. First of all, what does it mean for a  
18 cosigner not to be an Ohio resident?

19          A. If they aren't residing in Ohio and do  
20 not have an Ohio credential.

21          Q. Okay. What if they do reside in Ohio,  
22 but don't have legal presence documentation,  
23 would they still be considered an Ohio resident,  
24 or would they be considered a non-Ohio resident?

1           A. By the definition I presented to you for  
2 purposes of obtaining a license as a cosigner  
3 you have to have an Ohio credential which  
4 includes, you know, presenting the proof of the  
5 five elements, or if you don't have an Ohio  
6 credential or out-of-state credential, you must  
7 present proof of the five elements which does  
8 include proof of Ohio street address.

9           Q. If the cosigner is not an Ohio resident,  
10 they could present an out-of-state credential  
11 and their social security number even if they  
12 came from a state where their credential was  
13 available to them regardless of their  
14 immigration status, correct?

15          A. We don't have a clause in there. All it  
16 says is out-of-state credential.

17          Q. So any out-of-state credential would be  
18 accepted?

19          A. Yes.

20          Q. Any driver's license from any other  
21 state?

22          A. That's included as a credential, yes.

23          Q. Okay. Turning to the next page, D 1 d,  
24 it states, a cosigner must be asked if he or she

1 is a legal parent or guardian of the applicant  
2 but is not required to provide documentation  
3 proving the relationship or guardianship. Is  
4 that an accurate reflection of the policy?

5 A. Yes.

6 Q. Does the cosigner have to say yes to  
7 that question?

8 A. No.

9 Q. What happens if the cosigner says no?

10 A. Then they're still allowed to cosign.  
11 They fall under the section of the Ohio Revised  
12 Code that states they're a responsible adult. I  
13 don't know the exact language, but that's the  
14 language that's contained in there if no parent  
15 or guardian.

16 Q. So they must be asked the question, but  
17 they can say no and still get a license?

18 A. Yes.

19 Q. Are they permitted to still sign the  
20 notice of cosigner liability form in that  
21 instance?

22 A. They would need to if they're cosigning.

23 Q. And in this context the word guardian in  
24 subsection d, is that used in the legal sense?

1           A. I didn't write that language so I can't  
2 speak to it.

3           Q. So you don't know whether they have to  
4 show -- if they're not the legal parent whether  
5 they would have to say they're the legal  
6 guardian?

7           A. All it says is legal parent or guardian.

8           Q. I just don't know whether legal only  
9 applies to parent or to guardian?

10          A. Right.

11          Q. Going down to subsection f, the clause  
12 where -- so you just referred to the responsible  
13 person language from the Ohio Revised Code. So  
14 in this subsection the clause or if there is no  
15 parent or guardian, does that mean that the  
16 parents or guardians must be dead, or could it  
17 mean something else?

18          A. I can't speak to the meaning of that.  
19 All it says is if no parent or guardian.

20          Q. Do you know that -- how the deputy  
21 registrars -- let me rephrase.

22                 Has the BMV directed deputy registrars  
23 how to interpret what that means?

24          A. Not to my knowledge.

1           Q. Do the deputy registrars ever call up  
2 your -- call up license control and ask you a  
3 question, say there's a person who's here who's  
4 not the parent or guardian, how do we find out  
5 if there is no parent or guardian?

6           A. They may, yes. If they have questions  
7 regarding it, they may call us.

8           Q. Do you know if license control -- what  
9 license control's response in those instances  
10 would be?

11          A. According to policy, license control's  
12 response should be if they state no parent or  
13 guardian, then they're permitted to cosign per  
14 the policy.

15          Q. But do they have to state that the  
16 person has no parent or guardian or that the  
17 parent or guardian just isn't there that day, do  
18 you know?

19          A. If there is no parent or guardian.  
20 That's -- I mean, that's the policy. There is  
21 no -- they don't have to state if they're  
22 present or dead or anything.

23          Q. So you have never had occasion to  
24 actually interpret for the deputy registrars or

1 decide what it means to say or if there is no  
2 parent or guardian?

3 A. No.

4 Q. Is there anyone -- so you said you don't  
5 know what the meaning is in that context?

6 A. Correct.

7 Q. Okay. Is there anyone at the BMV you  
8 think would?

9 A. I can't speak for anyone else.

10 Q. So you don't know if there's anybody  
11 that maybe would have been more involved in  
12 deciding this policy or deciding how to  
13 interpret?

14 A. No.

15 Q. So if a 16 year old has two parents  
16 present in the U.S. without immigration status,  
17 and that 16 year old is a U.S. citizen, but they  
18 have a neighbor who's a U.S. citizen and is  
19 willing to assume financial responsibility and  
20 be a cosigner, could that 16 year old get a  
21 driver's license using that neighbor as a  
22 cosigner?

23 A. Assumably so.

24 Q. what do you mean by --

1           A. If -- as it says there, says a  
2     responsible person who's willing to assume the  
3     obligation imposed by ORC 4507.07.

4           Q. So it would comply with BMV policy for  
5     the cosigner to say to the question of whether  
6     he or she is the legal parent or guardian to say  
7     no and then cosign for that minor?

8           A. Yes.

9           Q. Would the minor have to state  
10    affirmatively that she has no parents?

11          A. No.

12          Q. In section h it states, if an applicant  
13    or cosigner refuses to sign the electronic  
14    application for an Ohio credential, issuance  
15    must be denied, correct?

16          A. Yes.

17          Q. By signing that electronic application  
18    the cosigner is not stating that she is the  
19    parent or guardian of the child?

20          A. Correct.

21          Q. Turning to the next page under  
22    subsection b, procedures for a new cosigner,  
23    could you read to yourself section b ii.

24          A. (Witness complies.)

1 Q. Any idea why this section doesn't use  
2 the language if there is no parent or guardian  
3 the way the section we looked at in D 1 f does  
4 say that?

5 A. I do not know.

6 Q. Okay. In the chart in section E there's  
7 a code for father, guardian, mother, other, and  
8 then emancipated is separate, right?

9 A. Uh-huh.

10 Q. So the person that we just discussed in  
11 the hypothetical where the U.S. citizen neighbor  
12 is a cosigner, would that person fall under O?

13 A. Yes.

14 Q. When the cosigner fills out -- I'm  
15 sorry. Are you familiar with Form 2203, Notice  
16 of Cosigner Liability?

17 A. Yes.

18 Q. And the cosigner must sign that form,  
19 correct?

20 A. Yes.

21 Q. And then the deputy registrar keeps one  
22 copy, and the cosigner keeps one copy, correct?

23 A. Yes.

24 Q. And if the cosigner is not a U.S.



1 citizen, the cosigner's identification documents  
2 must be scanned along with it?

3 A. The Proof of Identity Manual identifies  
4 what's required to be scanned and not be  
5 scanned. I don't believe it's restricted just  
6 to non-U.S. citizens.

7 MS. BROWN: This is Exhibit 13.

8 --0--

9 (Deposition Exhibit 13 marked.)

10 --0--

11 BY MS. BROWN:

12 Q. The first page of this exhibit, are you  
13 familiar with this form?

14 A. You said the first page?

15 Q. The first page, yes.

16 A. Yes.

17 Q. What is it?

18 A. It's the BMV 2203, Notice of Cosigner  
19 Liability.

20 Q. So all cosigners must sign this form,  
21 correct?

22 A. For license applications, yes.

23 Q. The second page is the instructions from  
24 the forms manual for this form. Is that

1 correct?

2 A. Correct.

3 Q. So the question I was referring to a  
4 little bit earlier is 1.2, section 3. It says,  
5 if the cosigner is not a U.S. citizen, the  
6 cosigner's identification documents must be  
7 scanned with the BMV 2203. Is that correct?

8 A. Yes.

9 Q. So that's the policy?

10 A. Yes. As I said, it also states in the  
11 Proof of Identity manual such as for the  
12 compliance issuance documents must be scanned  
13 for U.S. citizens as well.

14 Q. But this would be even for non -- for a  
15 standard document --

16 A. Yes.

17 Q. -- it would be required? Okay. If the  
18 cosigner is a non-U.S. citizen, correct?

19 A. Yes.

20 Q. Okay. So under number four it says,  
21 staple the white copy of the form with any other  
22 forms used for the issuance and file it with the  
23 day's work. What does it mean to file it with  
24 the day's work?

1           A. The deputy registrar keeps their day's  
2 work files at the deputy registrar and they file  
3 it away with that day's work.

4           Q. Is that something that is transmitted to  
5 you?

6           A. They keep it at the deputy registrar. I  
7 can't speak to that policy.

8           Q. When it says in number three scan the  
9 completed BMV 2203, is that scanned into BASS?

10          A. Yes.

11          Q. And so that -- the form itself is then  
12 in the BMV's possession?

13          A. The BMV 2203 is maintained with the  
14 daily work. The customer's identification  
15 documents are scanned into BASS not kept with  
16 the daily work.

17          Q. Okay. So the BMV would have the  
18 customer's identification documents, but the BMV  
19 would not have a copy of the signed Form 2203?

20          A. That's not what I said. They keep the  
21 signed form, they scan it into BASS, and they  
22 keep it on paper with their daily work, and then  
23 the customer's identification documents are  
24 scanned into BASS, but they don't keep a paper

1 copy of those.

2 Q. Understand. Okay. So at the end of the  
3 entire transaction the BMV would have a copy of  
4 the Form 2203?

5 A. Yes.

6 Q. And a copy of the identity documents?

7 A. Scanned into BASS, yes.

8 Q. And why is the requirement that the  
9 cosigner identification documents be scanned if  
10 the cosigner is not a U.S. citizen? why is that  
11 requirement not limited to just for compliant  
12 IDs like the U.S. citizens are limited to only  
13 having to have their identification documents  
14 scanned?

15 A. All documents for transactions that are  
16 issued to non-U.S. citizens, whether it's a  
17 nonrenewable, nontransferable credential or a  
18 regular credential issued to a permanent  
19 resident cardholder are scanned with the  
20 transaction. So all documents associated with  
21 that transaction are always scanned in. And  
22 then also with the compliance issuance they're  
23 scanned in as well for all compliance issuances  
24 whether U.S. citizen or not.

1 Q. Okay. So for all the non-U.S. citizens  
2 part of your answer so any document that they  
3 present to get -- to be issued the license would  
4 have to be scanned into BASS?

5 A. Any document issued for issuance, yes.

6 Q. So that would include identity  
7 documents, legal presence documents, proof of  
8 Ohio address, correct?

9 A. Yes. Unless they have a permanent  
10 resident card, because we only require them to  
11 present the permanent resident card.

12 --0--

13 (Deposition Exhibit 14 marked.)

14 --0--

15 BY MS. BROWN:

16 Q. Are you familiar with the Social  
17 Security Verification Instruction Sheet, Form  
18 2621?

19 A. Yes.

20 Q. So this form says that when the BMV  
21 obtains a person's Social Security number it is  
22 then compared with information on file with the  
23 Social Security Administration. Is that  
24 accurate?

1           A.   Yes.

2           Q.   Is this procedure also followed for  
3   cosigners?

4           A.   No.   I'll revise that statement with if  
5   they have an Ohio credential and they were  
6   issued their Ohio credential, then yes, their  
7   social security number would be verified at the  
8   time of issuance with that Ohio credential, but  
9   if they were never issued an Ohio credential,  
10   then no.

11          Q.   So if they were never issued an Ohio  
12   credential and they used their out-of-state  
13   credential and their social security number or  
14   they use, say, other proof of the five elements,  
15   you would not compare their social security  
16   number to the social security Administration's  
17   current number on file?

18          A.   Correct.

19          Q.   So I want to turn now to the USCIS  
20   manual which counsel has provided to me right  
21   before the deposition. This is an updated  
22   version of the USCIS manual that we previously  
23   had.

24                                   --0--

1 (Deposition Exhibit 15 marked.)

2 --0--

3 MS. BROWN: This is Exhibit 15.

4 BY MS. BROWN:

5 Q. Are you familiar with this manual?

6 A. I recently learned of this updated  
7 manual's existence, yes.

8 Q. Were you familiar with the previous  
9 version?

10 A. No.

11 Q. Have you ever seen the previous version?

12 A. No.

13 Q. And was the version in front of you,  
14 Exhibit 15, is this currently used by the BMV?

15 A. It is used in the telecommunications  
16 section, and that's all I can speak about it.

17 Q. What is the telecommunications section?

18 A. It is the section of the BMV that  
19 answers phone calls from the public about  
20 general information, suspension questions,  
21 things related to that.

22 Q. Okay. Was it generated by the BMV or by  
23 USCIS?

24 A. The BMV.

1 Q. Do you know when it was implemented --

2 A. No.

3 Q. -- or went into effect? No.

4 If you could just turn to page 10 of  
5 this document. I'm sorry. I apologize. This  
6 is the first time I've seen this particular one  
7 so give me a minute.

8 Okay. Turn to page 7. Under the I-94  
9 status refugee, is that -- if you need to take a  
10 minute to read it, is that consistent with the  
11 information in the Deputy Registrar Procedure  
12 Manual?

13 A. Yes.

14 Q. And is the reason you didn't know this  
15 document existed because it's only used by the  
16 telecommunications department?

17 A. Correct.

18 Q. Deputy registrars do not use this  
19 manual?

20 A. No.

21 Q. Is it transmitted to them in any form?

22 A. Not that I'm aware of.

23 Q. So I think you've sort of discussed  
24 this, but the purpose of this manual is to



1 assist telecommunication staff in the BMV with  
2 answering questions from the public. Is that  
3 correct?

4 A. Yes.

5 Q. And do they receive other training or  
6 explanation, presentations of any kind besides  
7 just being given this manual?

8 A. I can't speak to that.

9 Q. You don't know?

10 A. I don't know.

11 Q. And who's the head of the BMV  
12 telecommunications department?

13 A. They have their own administrator as  
14 well as chief and assistant chiefs.

15 Q. Do you know who the administrator is?

16 A. Yes. His name is Greg Edwards.

17 Q. I don't think I stated it, but this was  
18 topic nine as you probably figured out.

19 A. Yes.

20 Q. Okay. We're going to move on to topic  
21 10.

22 (Recess taken.)

23 BY MS. BROWN:

24 Q. One additional question before we move

1 on to topic 10. Have you ever seen a refugee  
2 I-94 that had an expiration date on it?

3 A. I can't recall a specific instance.

4 Q. Okay. Topic 10, Exhibit 16.

5 --0--

6 (Deposition Exhibit 16 marked.)

7 --0--

8 BY MS. BROWN:

9 Q. What is this?

10 A. This is the section of the Deputy  
11 Registrar BASS User Guide for DL/ID transaction.  
12 It is kind of the instructions on how the deputy  
13 registrar should complete the cosigner page  
14 inside of BASS when doing an application.

15 Q. Okay. So is the information reflected  
16 here the only information that the deputy  
17 registrar would collect about the cosigner's  
18 personal information?

19 A. Yes.

20 Q. So that's name -- full name,  
21 relationship to the applicant, Ohio driver's  
22 license ID number or other ID number?

23 A. Yes.

24 Q. Okay. And then there's a box for

1     investigative review. Is that if there's  
2     something suspicious about the transaction that  
3     would be checked?

4             A. Yes.

5             Q. So if the person provides an  
6     out-of-state credential or other document to  
7     show identity, that would be reflected in the  
8     other ID box?

9             A. Yes.

10            Q. And would the -- would it be written as  
11     Indiana driver's license number XYZ or some  
12     other format?

13            A. They would just enter in the ID number,  
14     or if they don't have an ID -- I say ID as in ID  
15     or license number. Or they would enter in  
16     social security number if that's all they have  
17     to enter.

18            Q. So if it was an out-of-state driver's  
19     license, it wouldn't even say the state, it  
20     would just say the number?

21            A. Yes.

22            Q. And then relationship, does that include  
23     the category mother, father, guardian, other  
24     that we looked at before?

1 A. Yes.

2 Q. And emancipated?

3 A. Yes.

4 Q. And when you click on next at the bottom  
5 of the screen, what comes up next?

6 A. It goes on to the next page of the  
7 application in BASS. I don't recall exactly  
8 what that next screen is.

9 Q. But it's not about cosigner information?

10 A. No.

11 Q. So there's no other information other  
12 than on this screen that's collected from the  
13 cosigner, correct?

14 A. The Form 2203, other than that, that's  
15 it.

16 Q. Which is mainly their signature, right?  
17 Signature, relationship and date?

18 A. Yes.

19 Q. Where in the drivers manual, if  
20 anywhere, does it state that a cosigner is  
21 considered an applicant for a license?

22 A. I don't have the entire manual in front  
23 of me obviously, but I don't recall a specific  
24 instance.

1 Q. Do you recall any specific instances  
2 without reading the very lengthy manual right  
3 here where it states that a cosigner is subject  
4 to the same documentary requirements --  
5 documentation requirements as an applicant?

6 A. Other than in the Proof of Identity  
7 Manual where it identifies that they have to  
8 present the proof of five elements or the Ohio  
9 credential, no.

10 Q. Okay. But the requirements in that  
11 Proof of Identity -- the portion of the Proof of  
12 Identity section that we reviewed had slightly  
13 different requirements for cosigners versus  
14 applicants, right?

15 A. Only because if they were a first  
16 applicant they would never have an Ohio  
17 credential to present, yes.

18 Q. I want to turn back to Exhibit 3. You  
19 still have the interrogatories, requests for  
20 admissions and document production. If I could  
21 turn your attention to interrogatory number one.  
22 Interrogatory number one states, please state  
23 the BMV's definition of a driver's license  
24 applicant including the policy, regulation or

1 other source that contains the definition. And  
2 could you read the answer you gave?

3 A. (Witness complies.)

4 Q. So you stated that no statute in the  
5 Ohio Revised Code or rule in the Ohio  
6 Administrative Code governing the BMV contains  
7 the definition for a driver's license applicant,  
8 correct?

9 A. Yes.

10 Q. Is there any other source within the BMV  
11 or -- let me rephrase.

12 Is there any policy within the BMV or  
13 directive or guidance that provides a definition  
14 of an applicant?

15 A. Not that I recall.

16 Q. Moving on to topic 11. If an applicant  
17 does not present documents at a deputy registrar  
18 sufficient to show legal presence per BMV  
19 policy, does the BMV consider that a denied  
20 application or a person who has not applied?

21 A. If the application isn't completed, then  
22 it can't be denied. They may not allow the  
23 transaction to be completed, but other than  
24 that, no.

1 Q. I'm sorry. Because it wasn't exactly a  
2 yes or no question, so I don't know what you  
3 meant.

4 Do they consider that to be a -- so if a  
5 person comes in and presents documentation and  
6 the deputy registrar staff says this is not  
7 enough to show legal presence or this is not the  
8 documentation you need for legal presence and  
9 turns that person away, that would be considered  
10 a person who has not applied?

11 A. Correct.

12 Q. Okay. It would not be considered a  
13 denied application?

14 A. Correct. It's just an incompleting  
15 application.

16 Q. Does the BMV require deputy registrars  
17 to track instances where someone was not  
18 permitted to apply for a reason like that?

19 A. No.

20 Q. For any other reason?

21 A. No.

22 Q. So there's no written record anywhere in  
23 the BMV's possession that would show how many,  
24 for instance, refugees were turned down -- were

1 told they couldn't apply because their I-94 was  
2 more than two years old and they didn't have  
3 other legal presence documentation?

4 A. BMV has no documents containing such,  
5 no.

6 Q. And do you know if any deputy registrars  
7 track that information?

8 A. I can't speak for the deputy registrar.  
9 I do not know.

10 Q. You never had a conversation with any  
11 deputy registrars that led you to believe that  
12 they might be tracking that on their own  
13 somehow?

14 A. No.

15 Q. Okay. What about applications that are  
16 completed and are denied, are those tracked?

17 A. Yes.

18 Q. And is that information sent to the BMV?

19 A. It's actually tracked inside of the  
20 license control department.

21 Q. Okay. And what kinds of reasons for  
22 denials would there be?

23 A. There are reasons related to the  
24 response that USCIS provides during SAVE



1 verification.

2 Q. So there's no other reason -- well, let  
3 me ask is there any other reason that an  
4 application could be denied on another basis  
5 besides?

6 A. If the issuance is identified as not  
7 having the proper documentation for issuance, it  
8 may be sent to the deputy registrar field  
9 representative staff who will then coordinate  
10 with the deputy registrar to get that customer  
11 back in to ensure that they can provide all the  
12 documentation that's required. They may have  
13 presented all the documents, but the deputy  
14 registrar didn't scan it and there are separate  
15 procedures for that as well.

16 Q. So in that case would that be considered  
17 an application that was denied?

18 A. Yes.

19 Q. Okay. Okay. And is there -- so if a  
20 person does what you just mentioned where their  
21 application is denied, but then the deputy  
22 registrar calls them back in and they figure out  
23 how to fix whatever the problem is and that  
24 person gets issued a license, would that still

1 show up anywhere in BASS or any other system as  
2 showing that they were denied and then approved,  
3 or would it just sort of turn into an approval  
4 and that would be the only record?

5 A. The previous application is still there  
6 showing that the denial happened, and then the  
7 new application will be present as well if it is  
8 completed.

9 Q. Okay. So switch for a minute to talking  
10 about applications that are approved. How are  
11 those tracked by the BMV?

12 A. There's an internal tracking system  
13 contained in BASS that the application is  
14 completed, and then if it goes through SAVE  
15 verification, it is immediately verified at the  
16 deputy registrar. If it is not verified, then,  
17 you know, it goes through its own process, and  
18 then that tracking system will send that  
19 application to the -- to the company that prints  
20 the license for us, and then they print and mail  
21 out that license.

22 Q. Okay. And -- but the BMV would maintain  
23 a record of the person's information that was  
24 approved and the status showing that they have a

1 license now?

2 A. Yes.

3 Q. Okay. And that is received by the BMV  
4 more or less instantaneously through BASS --

5 A. Yes.

6 Q. -- from the deputy registrar? Okay.

7 So let's talk about what happens when  
8 legal presence documentation is presented and  
9 then it goes through SAVE. So if the legal  
10 presence documentation looks complete to the  
11 deputy registrar, they then run the information  
12 through SAVE. Is that correct?

13 A. It is required that they run it through  
14 if they fall in the categories of individuals  
15 that are required to go through SAVE  
16 verification, yes.

17 Q. And that's now all non-U.S. citizens?

18 A. It is all non-U.S. citizens and U.S.  
19 citizens that are presenting a Certificate of  
20 Citizenship or Certificate of Naturalization.

21 Q. And so if -- we'll get more into SAVE in  
22 topic 18, but if SAVE reflects the -- or does  
23 not verify the documents or says there's some  
24 kind of problem, would that then be considered a

1 denied application or a person who wasn't  
2 permitted to apply?

3 A. It depends on the stage of the  
4 verification process. Verification is a  
5 three-step process. Step three allows us to  
6 send a copy of those documents to USCIS so they  
7 can have eyes on that document. And after that,  
8 there's an additional time frame that allows for  
9 us to receive additional response from SAVE  
10 indicating whether they have status or not.

11 Q. Okay. If a refugee presents an I-94 and  
12 no other legal presence document and their I-94  
13 is more than two years old, they would never get  
14 to the step of being verified through SAVE. Is  
15 that correct?

16 A. Per the policy, yes.

17 Q. So they would just be turned away  
18 without going through the steps with SAVE?

19 A. Correct. They should not have the  
20 application completed.

21 Q. Okay. Now when a person's information  
22 is run through SAVE, they -- if the  
23 application -- if the documents are verified,  
24 they would receive Form 2443, Ohio Interim

1 Document. Is that correct?

2 A. If they're verified immediately at the  
3 deputy registrar, yes.

4 Q. And sometimes it takes longer?

5 A. Yes, there are times where it may take  
6 longer.

7 Q. What would -- what form would they  
8 receive if it's going to take longer? Do they  
9 get -- they're just told to come back?

10 A. Nope. They get the Form 2444, BMV 2444.  
11 That gives them the case information related to  
12 their USCIS case so they can check the case  
13 status -- well, the status that USCIS provides  
14 to them, as well as additional information such  
15 as their Ohio application information and gives  
16 them some more details on what they should do.

17 Q. Is that something they can check like  
18 online, or no?

19 A. Something they can check related to?

20 Q. To their license.

21 A. They can check their license application  
22 progress on BMV's website, yes.

23 Q. And then if the SAVE verification's  
24 going to take a while, they would -- if then

1 eventually once they get the results back at the  
2 deputy registrar, the deputy registrar would  
3 contact them as well, the customer?

4 A. No. If their response -- once the  
5 response is received, if it is what is  
6 determined to be an approved response -- USCIS  
7 provides us with a response that we determine to  
8 be approved to print, we just mail -- print and  
9 mail the license to them.

10 Q. If they're denied, they would receive  
11 BMV Form 2445 showing that they were denied,  
12 correct?

13 A. Correct.

14 Q. And would they also receive the SAVE  
15 Fact Sheet if they were denied?

16 A. Yes.

17 Q. Okay. When an applicant is  
18 considered -- when someone is considered to be a  
19 person who's not applied because they don't have  
20 the required documentation, there's no mechanism  
21 to track what countries those people are from or  
22 what legal presence documentation they tried to  
23 present, anything like that, right?

24 A. BMV has no knowledge of any said -- no.

1 Q. In the call logs that you referred to  
2 earlier in your testimony you said that there's  
3 a line for like the subject of the call from the  
4 deputy registrar, right?

5 A. There's a narrative section, yes.

6 Q. And so it's a narrative section, not  
7 just like few words?

8 A. There's a call summary which oftentimes  
9 is left with just the customer identifier, and  
10 then there's a narrative section where we would  
11 type in the notes respective for that phone  
12 call.

13 Q. If someone came in without enough legal  
14 presence documentation, say they had an I-94  
15 that was three years old and they didn't have  
16 any other documentation to show legal presence,  
17 that would -- that would be reflected in the  
18 call log in that narrative description if they  
19 called license control, right?

20 A. The dates should be captured in there,  
21 yes.

22 Q. But if they didn't call license control,  
23 there wouldn't be any record of that?

24 A. Not to our knowledge, no.

1 Q. Does the chat function have a mechanism  
2 for tracking that kind of information, too?

3 A. The chat information just contains the  
4 agency -- the deputy registrar agency that  
5 chatted in with us in license control as well as  
6 the customer identifier that they provided to us  
7 as well as their question, and then it contains  
8 the transcript of the chat. So any information  
9 that's contained in the transcript of the chat  
10 is included there.

11 Q. The whole transcript would be saved?

12 A. Yes.

13 Q. So would it be possible to search  
14 through the call log in some way of searching  
15 electronic records by searching for any  
16 conversation that concerned the word refugee or  
17 contained the word refugee?

18 A. There's a keyword search, yes.

19 Q. So theoretically that could generate a  
20 list of all -- sort of a spreadsheet of all the  
21 calls that dealt with questions to refugees in a  
22 certain time period for instance?

23 A. It just generates every call log that  
24 would mention the word refugee that the phone



1 log system is able to recognize.

2 Q. When an application is approved, we  
3 discussed how the information gets transmitted  
4 to the BMV, but what information specifically  
5 would be tracked with regard to legal presence,  
6 just that they showed legal presence or anything  
7 more specific than that?

8 A. The information that's required to  
9 verify the document is captured as well. Such  
10 as with an I-94, the I-94 number's captured as  
11 well as the applicant's name, date of birth, and  
12 if there is an expiration date listed, then that  
13 may be captured as well.

14 Q. Topic 12. I think we already covered a  
15 lot of this when we looked at Exhibit 16. So  
16 the expiration of lawful presence, if any, is  
17 not something that's tracked about the cosigner  
18 by the deputy registrars, right?

19 A. Correct. For the cosigner, yes.

20 Q. Because you had testified that  
21 Exhibit 16 basically includes all the  
22 information that would be tracked.

23 A. If the document is scanned so the  
24 information's on the document however it's not

1 entered into BASS.

2 Q. If a minor attempts to apply for a  
3 Temporary Instruction Permit Identification  
4 Card -- or a TIPIIC, can I call it?

5 A. Yes.

6 Q. If a minor attempts to apply for a TIPIIC  
7 or a driver's license and the cosigner presents  
8 the appropriate documentation to be a cosigner,  
9 but then the minor's application is denied for  
10 some other reason, does the BMV require the  
11 deputy registrars to track any information about  
12 that cosigner?

13 A. Other than the information that's  
14 captured in the license system, they just -- the  
15 customer that had the application denied is  
16 notified and that's all.

17 Q. Okay. So if the application were --  
18 this information in Exhibit 16 would still be in  
19 the system and it would show that the minor was  
20 denied and that this was who their cosigner was?

21 A. In accordance with the retention, yes.

22 Q. What if the minor is not rejected but  
23 just doesn't have their own -- is unable to show  
24 the proof of five elements on their own? would

1 this cosigner information not even be entered  
2 into the system at that point?

3 A. It would not be captured because the  
4 application would not have been completed.

5 Q. Okay. They would just be a person not  
6 considered to have applied?

7 A. Yes.

8 Q. If a minor comes in to apply for a TIPIIC  
9 or a probationary driver's license but the  
10 cosigner doesn't have the sufficient legal  
11 presence documentation, at that point the person  
12 would be considered -- the minor would be  
13 considered a person not to have applied?

14 A. Yes.

15 Q. And this information on Exhibit 16 would  
16 never be completed?

17 A. Correct.

18 Q. In previous Exhibit 12 on the second  
19 page, page 127, in subsection h it says, if an  
20 applicant or cosigner refuses to sign the  
21 electronic application for an Ohio credential,  
22 issuance must be denied, correct?

23 A. Yes, it says that.

24 Q. So if an applicant fills -- has all

1 their correct documentation and the cosigner has  
2 all their correct documentation, but then the  
3 cosigner says I'm not signing that, I understand  
4 the license would be denied, correct?

5 A. Per that language in there, yes.

6 Q. What do you mean?

7 A. The application should be considered as  
8 not having been completed because at that point  
9 the information's not transmitted.

10 Q. Okay. So then none of the information  
11 in Exhibit 16 would end up being saved in the  
12 BASS system --

13 A. Correct.

14 Q. -- because the application would just --  
15 okay.

16 And if a state identification card minor  
17 applicant wants to -- if an applicant, a minor,  
18 wants to get a state ID card, a cosigner is  
19 required, correct?

20 A. Correct.

21 Q. And it's the same requirements for who  
22 can be a cosigner as for a license, correct?

23 A. Yes.

24 Q. The only difference is that they

1 don't -- the cosigner would not have to sign the  
2 Form 2203?

3 A. That's correct.

4 Q. And the information in Exhibit 16 would  
5 be the same information that the deputy  
6 registrars would capture for the cosigner  
7 regardless of whether it was a cosigner for a  
8 driver's license or a state ID card?

9 A. Yes.

10 MS. BROWN: Can we go off the record for  
11 a second?

12 (Discussion off the record.)

13 ==O==

14 Thereupon, the luncheon recess was taken  
15 at 12:15 p.m.

16 ==O==

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1 MAY 23, 2019

2 THURSDAY AFTERNOON SESSION

3 1:24 P.M.

4 --O--

5 BY MS. BROWN:

6 Q. Moving to topic 18. What is the purpose  
7 of the SAVE system?

8 A. The purpose of the SAVE system in a  
9 federal respect or for the Ohio BMV?

10 Q. For the Ohio BMV.

11 A. The Ohio BMV uses the SAVE system to  
12 verify customer's legal presence status based on  
13 the documents they present.

14 Q. And I think you previously testified  
15 that -- I'm sorry. Let me rephrase.

16 Is SAVE a part of USCIS?

17 A. The understanding is that SAVE is a  
18 system that is used to verify documents and  
19 legal presence status that is coordinated  
20 through USCIS. I can't speak to the structure  
21 of USCIS.

22 Q. Okay. Does the BMV pay to use the SAVE  
23 system?

24 A. To my knowledge, yes.

1 Q. Is it a per-transaction fee?

2 A. Yes.

3 Q. Is that fee passed on to the customer?

4 A. I can't speak to that. I don't believe  
5 so.

6 Q. Does SAVE verify legal presence of  
7 cosigners?

8 A. They only verify the legal presence of  
9 cosigners if they have been issued an Ohio  
10 credential that was verified previously through  
11 their legal presence, but at the time of the  
12 cosigner presenting their documents to cosign,  
13 no.

14 Q. Okay. So if a cosigner presents an  
15 out-of-state credential, that would not -- there  
16 would be no verification through -- let me state  
17 a different question.

18 If the cosigner is not a U.S. citizen  
19 and presents proof of the five elements through  
20 another way besides an Ohio credential, would  
21 those other documents be verified through SAVE?

22 A. No. Only the applicant's documents.

23 Q. And when deputy registrars use SAVE,  
24 they input information through BASS, which

1 automatically uploads it to the SAVE system. Is  
2 that correct?

3 A. It transmits the data to the SAVE  
4 system, yes.

5 Q. What does BASS stand for?

6 A. It's the Business Application Services  
7 System.

8 Q. Okay. And describe what BASS does for  
9 the BMV.

10 A. BASS is the holder of the application  
11 information as well as it acts as the point of  
12 sale system for the Ohio DL/ID.

13 ==0==

14 (Deposition Exhibit 17 marked.)

15 ==0==

16 BY MS. BROWN:

17 Q. I'm going to direct your attention to  
18 page 1328. I apologize that the quality is not  
19 great, but is this all the information that  
20 deputy registrars input to run an applicant  
21 through SAVE?

22 A. It's conditional based on the document  
23 that's presented, but yes.

24 Q. So when a deputy registrar employee



1 starts to use the BASS system to do SAVE  
2 verification, is this screen the screen that  
3 would pop up for each person or is it different  
4 depending on the document that you present?

5 A. The screen that they see is different  
6 based on the document and the requirements that  
7 USCIS has for us and what information is  
8 required to enter based on the document. This  
9 screen grab is a comprehensive list of all the  
10 fields that may appear.

11 Q. Okay. So no fields that are listed --  
12 there are no other fields that would appear  
13 besides what's listed here?

14 A. That's correct.

15 Q. Okay. But then certain things like I-94  
16 number, Visa number, passport number, different  
17 people may have different legal presence  
18 documents so some of those fields wouldn't  
19 apply --

20 A. Correct.

21 Q. -- to an individual. Okay.

22 So, for instance a refugee -- let's  
23 start with a refugee with one year in the United  
24 states. You would enter the I-94 number, I

1     assume?

2           A.   Yes.

3           Q.   Okay.  And then what would the  
4     expiration date be for a refugee who'd been here  
5     less than one year?

6           A.   The expiration date that we would send  
7     to USCIS is dependent upon the date that we  
8     enter in for the license expiration date, and it  
9     transmits to USCIS and they recognize the  
10    refugee status as such.  So we send them the  
11    date that the license expires, but they don't  
12    verify based on the premise that that is the  
13    expiration of their status.

14          Q.   So the expiration date refers to when  
15    the driver's license will expire?

16          A.   Yes, for this screen purpose, yeah.

17          Q.   So for a refugee who's been here for a  
18    year, that expiration date is going to be the  
19    date four birthdays in the future?

20          A.   Yes.

21          Q.   What would document description, what  
22    would that field be?

23          A.   The document description field is an  
24    open text field that is present when an I-94 is

1 presented or one of the categories of the I-797,  
2 whether it's the approval or the I-797C of the  
3 notice types we accept. That's just an open  
4 text field for the deputy. They can enter in  
5 I-94 refugee, they can enter in I-797. We give  
6 them advice on what to enter, but it's not a  
7 mandatory, if it's an I-797, they should enter  
8 in only I-797. It's just an open text field.

9 Q. If a refugee has been here, say, three  
10 years and is presenting an I-94 and an I-797C  
11 receipt notice, would -- where would it -- so I  
12 assume in that case an I-94 number would be  
13 entered, right?

14 A. It may be. When they're verifying an  
15 I-797 document, the fields that appear are the  
16 alien number field, the I-94 number field, the  
17 expiration date and document description. I-94  
18 number is just used to associate the I-797 with  
19 that individual, because they can't verify it  
20 based on the premise that the customer only has  
21 a 797.

22 Q. And in that case would the document  
23 description say I-797?

24 A. Yes, it may.

1 Q. And then in the situation we were  
2 talking about earlier where it's a refugee with  
3 one year here the document description would say  
4 I-94?

5 A. It may say I-94, it may say I-94  
6 refugee. They don't go into too much detail,  
7 because the character limit is pretty small.

8 Q. And what would be in the field document  
9 certificate number?

10 A. That is used for individuals that have a  
11 Certificate of Naturalization or Certificate of  
12 Citizenship. So that's used for U.S. citizens.

13 Q. What about card number?

14 A. That's if they've been issued a card by  
15 USCIS that is -- at this moment it is the I-551  
16 permanent resident card or the I-766, the  
17 employment authorization document.

18 Q. And does the photo match the applicant's  
19 document, does that field, is that just  
20 something that the deputy registrars look at the  
21 person and decide that?

22 A. That is returned based on what USCIS  
23 sends us. So when we transmit the data to  
24 USCIS, if they return a request for an image

1 match, what they do is there's an image that  
2 should display on the screen, and the deputy  
3 registrar looks at the card, because it only  
4 should appear for an I-551 or an I-766, and  
5 there's an image that appears on the screen, and  
6 then they have the card in hand. So if that  
7 verifies, then they select yes.

8 Q. So when an employee is filling out these  
9 fields to begin with, they won't be entering  
10 anything for the photo question because that's  
11 something that USCIS would have to send a  
12 request to the deputy registrar for?

13 A. Correct. The way the screen would  
14 function is after they enter the information in,  
15 such as the card number and expiration date of  
16 that individual's document, USCIS returns the  
17 information at that moment after the clerk hits  
18 next, and it would then display the information  
19 that says does the photo match, and it displays  
20 an image on the screen.

21 Q. And the image would be a photo from a  
22 551 or 766?

23 A. Yes.

24 Q. And then the deputy registrar employee

1 would look at that photo and look at the  
2 applicant and decide whether --

3 A. Look at the applicant's document.

4 Q. Look at the applicant's document.

5 A. The intent is to verify the image that  
6 appears versus the image that is on the  
7 document.

8 Q. And they would make a judgment call as  
9 to whether it was the same person?

10 A. Yes.

11 Q. Are documents like a foreign passport or  
12 a foreign counselor ID card run through the SAVE  
13 system?

14 A. The passport number may be depending on  
15 the document that they're presenting, but that  
16 typically only happens if they have the  
17 temporary residency stamp in that passport.  
18 That's normally conditionally for a year. Then  
19 that passport number will be entered, but other  
20 than that Ohio BMV does not verify the passport  
21 individually.

22 Q. So as part of entering the information  
23 into these fields do deputy registrars' staff  
24 upload documents to send to SAVE as well, like

1 upload the actual document or copy the actual  
2 document, or do they only enter in the  
3 information?

4 A. Deputy registrars only enter in  
5 information.

6 Q. Okay. So SAVE never includes -- there's  
7 never any need for deputy registrars to send a  
8 copy of an actual document to SAVE?

9 A. Not in the verification process.

10 Q. In any other process?

11 A. Not that I'm aware of.

12 Q. And I think you already testified that  
13 all noncitizens as well as U.S. citizens that  
14 have a Certificate of Naturalization are now run  
15 through SAVE?

16 A. Yeah. That's what the first paragraph  
17 on the page says up there. When that  
18 citizenship question's no or when they have  
19 those two documents, this is the screen that  
20 will appear.

21 Q. Is that requirement every time they  
22 renew their license as well? Is that  
23 requirement in place or just for the first  
24 credential?

1           A. It's every time they renew or be issued  
2   a credential that requires them to present that  
3   document.

4           Q. Are Social Security numbers ever run  
5   through or imputed into SAVE?

6           A. No. Social Security, as we discussed  
7   earlier, has their own verification system.

8           Q. Okay. If you can turn to the second  
9   page. I'm going to turn to the next page, 1329,  
10   but one additional follow-up question on the  
11   Certificate of Naturalization. If someone  
12   presents a Certificate of Naturalization or  
13   Certificate of Citizenship and then they're run  
14   through SAVE and their documents are verified,  
15   will they have to present it the next time they  
16   get their license renewed four years later?

17          A. Not unless they are attempting to be  
18   issuing a compliant credential for the first  
19   time on that next issuance. If the issuance  
20   that they are completing requires the  
21   presentation of that document, then it will be  
22   ran through the SAVE system such as a first  
23   compliant issuance or a new CDL driver, those  
24   are some requirements as to when that's



1 required.

2 Q. Okay. So on the second page of  
3 Exhibit 17 can you tell me what table 7.1 --  
4 what information table 7.1 provides?

5 A. It contains information related to the  
6 response that will immediately appear at the  
7 deputy registrar, and it's our interpretation of  
8 the response. USCIS provides us a response  
9 code, and we take that response and put it in  
10 the language for the deputy registrar on what  
11 action they should take based on that response.

12 Q. Okay. So is this -- are these eight  
13 options the only options that SAVE will -- the  
14 only responses that SAVE will give?

15 A. No. As I said, these aren't the actual  
16 coded responses that USCIS provides. USCIS  
17 provides us with a long list of responses. This  
18 is the responses that the deputy registrar will  
19 receive, but it's the interpreted version so the  
20 deputy registrars know what action they should  
21 take at the time of application and  
22 verification.

23 Q. So that response -- the eight responses  
24 are what BASS will spit out to the deputy

1 registrar, but they're not the exact responses  
2 that USCIS has given. They're sort of like a  
3 translation for the deputy registrars?

4 A. Yes.

5 Q. Okay. So is the one at the bottom,  
6 information has changed. You must start the  
7 transaction over, what does that mean?

8 A. So if the -- the only time that appears  
9 is if the customer has a document, and when the  
10 agency enters in the document they had a typo,  
11 and then they changed the information and it  
12 didn't verify, and the customer then presents an  
13 alternate document such as they presented us  
14 with an I-94, you know, as I indicated earlier,  
15 a refugee document, but then they present us  
16 with an I-766, but the refugee document doesn't  
17 verify, but the I-766 does, they have to cancel  
18 the transaction in BASS and restart it in order  
19 to attempt to have the I-766 verified.

20 Q. So that person could still walk out with  
21 a license that day?

22 A. Absolutely.

23 Q. How quickly do the -- do these -- one of  
24 these eight responses get transmitted to the

1 deputy registrar after they upload the  
2 information?

3 A. As fast as USCIS provides us with the  
4 response through the SAVE system. Oftentimes  
5 it's immediately, a second or two, tops. If  
6 there's a delay in the system, then, you know,  
7 it will cycle through the process and display,  
8 but it's immediately.

9 Q. Now, it looks like -- so it says, follow  
10 the instructions in the message for many of  
11 these categories. Is that a message that USCIS  
12 does or a message that the BMV generates?

13 A. So where it says follow the instructions  
14 in the message, it's referring to that bolded  
15 message that's directly above that statement.  
16 So where it says, the documents have not been  
17 verified successfully, if you're looking at the  
18 second column down, follow the instructions in  
19 the message. It's telling the deputy registrar  
20 to refer to what's in bold because that's what  
21 appears on their screen. So if they need to  
22 know how to interpret it, they can pull this out  
23 and see, okay, what do I do.

24 Q. So now it looks like some of these are

1 sort of accounting for there might have been  
2 just a misentry or typo of some sort and then  
3 you can sort of start over and reenter the  
4 information. Is that correct?

5 A. Yes.

6 Q. Okay. Now, when it says something like  
7 say if the -- under date of birth mismatch. If  
8 the information was entered correctly, click  
9 next to initiate the next step. So in that case  
10 if they look and -- if the employee looks and  
11 sees that the information is correct and then  
12 they click to initiate the next step, what would  
13 then happen?

14 A. It will provide them with -- if you look  
15 at the third column from the bottom where it  
16 says documents require additional verification,  
17 it will take them through that step, and then  
18 that text underneath it, it will display in the  
19 bold, and that text below it where it discusses  
20 click next to initiate additional verification,  
21 that is the steps they take, and then they  
22 finish through the application assuming that  
23 they have all the other documents that they are  
24 required to have.

1 Q. Okay. So when it says documents not  
2 verified, does that mean that USCIS is unable to  
3 verify that the document is authentic and  
4 actually issued to the person or does it mean  
5 something else?

6 A. At that moment in time USCIS is saying  
7 that based on the information you provided we  
8 can't verify the status that the customer's  
9 claiming to have. It's not saying -- you know,  
10 referring to any kind of fraud or anything.  
11 They just simply are saying we can't verify it.  
12 It requires additional work.

13 Q. And it doesn't -- does it explain  
14 anything more than that?

15 A. No. The actual technical response is  
16 requires additional verification, and that's all  
17 they tell us. They don't give us reasons why.

18 Q. So they don't say like this I-94 number  
19 doesn't exist or something like that?

20 A. No. Not at this time they don't give us  
21 any information.

22 Q. Do they later? Is there any additional  
23 information later?

24 A. Later on in the process -- as I

1 discussed, there's a three-step process to the  
2 verification. Step one occurs at the deputy  
3 registrar, step two and three are after post  
4 deputy registrar application. They may provide  
5 us with more detail, they may say no status, or  
6 they may provide us with a response that  
7 indicates that they don't have status and  
8 they're not employment authorized, but the  
9 response is conditional based on -- you know,  
10 there's approximately 104 of them so I can't  
11 speak to all of them off the top of my head.

12 Q. So let's talk a little bit more about  
13 the three-step process. The first step you said  
14 is at the deputy registrar's office, correct?

15 A. Yes.

16 Q. Is that just the inputting of this  
17 information that we just discussed from  
18 Exhibit 17?

19 A. Yes.

20 Q. Okay. And then what's the second step?

21 A. So the three-step process is owned by  
22 USCIS, so I will speak to the interpretation  
23 from Ohio BMV regarding that process.

24 Step two is an additional automated

1 overnight process where USCIS recognizes that  
2 they cannot verify it. So they attempt to  
3 reverify it using a systematic process.

4 Step three requires us to send a copy of  
5 the document to USCIS. We do that digitally.  
6 We don't use paper copies. Everything's digital  
7 through them now. And we send it through, and  
8 they review it on their end.

9 Q. Okay. So in that second step are you  
10 aware of how USCIS accomplishes that second  
11 step?

12 A. No.

13 Q. So you just get -- does the deputy  
14 registrar get some kind of notice stating  
15 whether it's been successful?

16 A. Once the deputy registrar receives  
17 payment for the application and the customer  
18 walks out of the agency, if it has not been  
19 verified, if that's what we're discussing, they  
20 get that BMV 2444 as discussed. And then if the  
21 customer -- unless the customer is attempting to  
22 receive the refund, or they are waiting on their  
23 card, they don't have a need to go back into the  
24 deputy registrar until -- unless they have to go

1 back for purposes of a denial to get a refund.

2 Q. And in that instance are the deputy  
3 registrars permitted to hold on to their  
4 documents?

5 A. No. The deputy registrars hand the  
6 documents back to the applicant after the  
7 procedure has been completed assuming there's no  
8 other process or reason to have kept the  
9 documents, but we don't advise on that.

10 Q. They don't -- when you say you don't  
11 advise on that, you mean you don't advise on  
12 when it's appropriate to hold -- for the deputy  
13 registrar to seize documents from someone?

14 A. Correct.

15 Q. Do you ever get calls asking about that?

16 A. They may call us about the seizure or  
17 confiscation of documents, but we refer them to  
18 their investigative procedures, and that's where  
19 we end in license control with it.

20 Q. Okay. To your knowledge, all of the  
21 steps that are required through SAVE --

22 Let me rephrase. All -- none of the  
23 steps that are required through SAVE for the  
24 verification would allow the deputy registrars



1 to seize documents for the purpose of the  
2 verification procedure?

3 A. If you're speaking of solely to SAVE  
4 verification, no, SAVE verification doesn't  
5 require the seizure of documents.

6 Q. Okay. Does the BMV have a record of the  
7 results of all submissions to SAVE?

8 A. Yes.

9 Q. And is that just contained in BASS?

10 A. Yes. BASS holds the data for SAVE  
11 verification.

12 Q. So would it be possible to find how many  
13 not like findings of non -- how -- what term do  
14 you use for a document that isn't successfully  
15 verified through SAVE through the three steps?

16 A. It's used as we call it a denial once  
17 it's gone through the verification process.

18 Q. So are there -- so would it be possible  
19 to get -- to run a search for all the denials of  
20 people who presented a refugee I-94, for  
21 instance?

22 A. At this moment in time we would be able  
23 to see the number of denials that occurred, and  
24 other than that I don't know the exact

1 limitations of the reporting inside of BASS. I  
2 do know that we can see numbers.

3 Q. And then flipping over to the first page  
4 of Exhibit 17, you were testifying earlier about  
5 how sometimes refugees might have their I-94  
6 information, sometimes they would have the  
7 I-797 -- so it might be entered under document  
8 description as I-797 or it could be entered as  
9 I-94, correct?

10 A. Depending on the information that is  
11 entered by that clerk, yes. They select -- the  
12 way it's driven is they select a document on one  
13 screen, and then when they click next to  
14 navigate to this screen, it gives the indication  
15 of what information's required to be entered.

16 Q. And so if you were to do a search of the  
17 denials that we were just talking about and you  
18 said you could see the number of denials by a  
19 certain category, would those be sorted by  
20 everyone that mentioned refugee in the term  
21 document description, or how would you go about  
22 doing that?

23 A. It is based on the document that the  
24 clerk selected for issuance. If you look at the

1 very top of the sheet, it's kind of blurry --  
2 not the very top, but if you look right there,  
3 it says issuing USCIS document name. It is  
4 sorted based on that document. So whether they  
5 select the I-797 or I-94 refugee or I-551, it's  
6 sorted by that. It's not sorted by the  
7 individual fields on this page.

8 Q. But if a refugee did present an I-797C  
9 and an I-94, you don't know which of those would  
10 be in that field for issuing USCIS document  
11 name, right?

12 A. If they selected -- if it falls under  
13 the situation where that customer has the  
14 refugee status that's over two years old and  
15 they present the I-797, that clerk is advised  
16 per the Proof of Identity Manual to select I-797  
17 as the issuing document which will mean that it  
18 is categorized inside of the reporting system  
19 that I referred to for the number purpose as  
20 I-797.

21 Q. And then if it's a refugee who's been  
22 here less than two years and they present an  
23 I-94 only, it will obviously say I-94 I would  
24 assume, right?

1           A. Yeah. There's a separate selection for  
2   them to select I-94 refugee.

3           Q. And it wouldn't say I-94. It would say  
4   I-94 refugee?

5           A. If they're a refugee. There is a  
6   separate I-94 for those that are not a refugee.

7           Q. And would it -- even if a person  
8   presented an I-797C, would it still say I-797?

9           A. Yes.

10          Q. It wouldn't say the C?

11          A. No.

12          Q. If a person applies for an Ohio  
13   credential and their information gets run  
14   through SAVE and after the three steps USCIS is  
15   unable to verify their documents, is that person  
16   considered to be having had their application  
17   denied?

18          A. Yes.

19          Q. And those people are tracked, the  
20   denials are all tracked?

21          A. Yes.

22          Q. And maintained by the BMV?

23          A. Yes.

24          Q. You referred to the retention policy

1 earlier, and there may be multiple retention  
2 policies, but how long would that sort of  
3 information be retained?

4 A. I don't know the retention policy on  
5 that.

6 --0--

7 (Deposition Exhibit 18 marked.)

8 --0--

9 BY MS. BROWN:

10 Q. How long are BASS records generally  
11 maintained -- retained, if you know that?

12 A. I don't know the retention policy on the  
13 BASS records either. I don't know the exact  
14 retention policy.

15 Q. So if a refugee only -- just still  
16 staying on Exhibit 17 for another minute. If a  
17 refugee has only issued an I -- only brought an  
18 I-94 as their sole legal presence document,  
19 would they even get to the step of doing this  
20 verification through SAVE, or would they just be  
21 told that they didn't -- I'm sorry. Let me  
22 rephrase, because I think I might have forgotten  
23 an important part of the question.

24 If a refugee who's been -- whose I-94 is

1 more than two years old presents the I-94 as  
2 their sole legal presence document to the deputy  
3 registrar, would the deputy registrar even use  
4 the SAVE verification system?

5 A. No.

6 Q. Okay. So this exhibit is a number of  
7 potential forms that could be issued to  
8 customers. So I just want to direct your  
9 attention to Form 2444 which is stamped  
10 page 1126 of the exhibit. In what instances is  
11 this form issued?

12 A. It is issued any time SAVE provides a  
13 response that has been interpreted as not  
14 verified.

15 Q. Okay. And so the applicant is at the  
16 deputy registrar's office, they do the initial  
17 step of SAVE verification, it comes back not  
18 verified, does the deputy registrar then hand  
19 this to them and tell them they'll be in touch?

20 A. No. So this section 9.2 right here  
21 inside this document actually lists the process  
22 that happens, but I'll try to explain it in a  
23 way that's aware. The agency finishes the  
24 transaction, and will actually take the image of

1 the customer, and then save the transaction  
2 inside of the BASS system, and then it goes into  
3 the tracking system I referred to earlier where  
4 they track the SAVE responses and all the DL  
5 applications once they've been completed. At  
6 that time after they take the image and save  
7 that transaction that is when that paper, that  
8 form is handed to the customer, at the end.

9 Q. So if the person is -- referring back to  
10 Exhibit 17, if the person's information is  
11 entered into the -- this screen and then the  
12 first response comes out information has been  
13 verified right there at the deputy registrar  
14 office, the person wouldn't get this document?

15 A. That's correct.

16 Q. 2444. Okay.

17 So it's only if their verification has  
18 not been -- they don't have a final decision  
19 yet?

20 A. Correct.

21 Q. And so it's provided to the applicant  
22 right there at the deputy registrar's office?

23 A. Yes.

24 Q. Page 1128 of Exhibit 18. What is this

1 document?

2 A. This is the document that once it goes  
3 through that three-step verification process and  
4 we have, you know, gone through that process, we  
5 will mail this to the customer along with the  
6 SAVE Fact Sheet advising them that their  
7 application has been denied.

8 Q. And is this -- this could be mailed to  
9 the applicant or provided to them at the deputy  
10 registrar's office?

11 A. It is always mailed to them, and that is  
12 because the -- once that customer saves that  
13 transaction and they receive the 2444, at that  
14 point they have -- I don't want to say no  
15 contact, but they don't have a necessity to go  
16 back to the deputy registrar until they  
17 either -- there was an issue discovered with  
18 their application, or it has been denied and  
19 they need to go back to the deputy registrar for  
20 a refund which it states in this letter as well.

21 Q. If you could turn to the next page,  
22 which is 1199. It refers to the BMV  
23 investigation receipt. The BMV investigation  
24 receipt would never be issued in connection with



1 a SAVE verification issue, correct?

2 A. I can't speak to when the investigation  
3 receipt's been issued. That is the BMV  
4 investigation section.

5 Q. But license control doesn't advise on  
6 investigation receipts at all?

7 A. If they have to follow the investigative  
8 procedures, that's all we tell them to do, is  
9 follow their procedures.

10 Q. Okay. And if you could turn to the last  
11 page of this exhibit, of Exhibit 18, is this the  
12 SAVE Fact Sheet?

13 A. Yes.

14 Q. And this is provided to anyone along  
15 with a pending, say, verification letter and a  
16 notice of denial letter or one or the other?

17 A. It should be given to the customer at  
18 the time post application has been completed at  
19 the deputy registrar. It's available for them  
20 to print at any time. It's not generated with  
21 an application. And then we also mail them a  
22 copy with the denial letter just in an attempt  
23 to give them all the information that we can  
24 give them.

1 Q. Okay.

2 MS. BROWN: Exhibit 19.

3 --0--

4 (Deposition Exhibit 19 marked.)

5 --0--

6 BY MS. BROWN:

7 Q. So this document was provided to the  
8 Plaintiffs in discovery in response to a  
9 question about training on USCIS procedures and  
10 other procedures. Do you see at the top where  
11 it says New Forms?

12 A. Yes.

13 Q. Are all of these six forms listed new?

14 A. These forms were all new with the  
15 exception of the 5745 and 2424 as of July 2018.  
16 Once central issuance, as we call it, went live  
17 and became in existence, that's when the rest of  
18 the documents were created or made accessible to  
19 the deputy registrar.

20 Q. Okay. So other than those two that you  
21 just mentioned the rest of them all became  
22 used -- started to be used around July of 2018?

23 A. July 2nd would have been the date.

24 Q. And why was it necessary to create new

1 forms at that point?

2 A. The license issuance process completely  
3 changed, and a lot of the procedures changed  
4 mostly related to the compliant card and the  
5 Real ID Act.

6 Q. So the Acceptable Document List 2430  
7 were -- was the list of acceptable documents  
8 changed because the requirements changed to  
9 issue compliant cards then?

10 A. The 2430 is the Acceptable Document List  
11 for the compliant DL/ID.

12 Q. And the Ohio Interim Documentation form  
13 went into effect because the policy changed  
14 about mailing the credential instead of giving  
15 the credential on-site to the customer?

16 A. Yes.

17 Q. And why did the BMV SAVE Fact Sheet  
18 change?

19 A. That SAVE Fact Sheet is the one that is  
20 contained in Exhibit 18. That was implemented,  
21 because we provided the customer -- we as in  
22 Ohio BMV gave the intent to apply the SAVE  
23 verification process across the board for all  
24 individuals presenting USCIS documentation, and

1 in discussion with USCIS for purposes of SAVE  
2 verification that was the advice that they gave  
3 to us.

4 Q. Is the SAVE Fact Sheet issued by USCIS?

5 A. Yes. It's issued by USCIS.

6 Q. Was there a similar sheet before  
7 July 2nd, 2018?

8 A. No. I misspoke. It may have been in  
9 existence with USCIS, but Ohio BMV did not use  
10 it.

11 Q. And the information -- the USCIS  
12 informational paper, is that also known as the  
13 pending SAVE verification form?

14 A. Yes. This training document as you  
15 referred to it is from what I discussed as the  
16 roundtables earlier, and this was given before  
17 July 2018 to give the deputy registrars  
18 introduction into the new process. That was  
19 what it was called prior to being called the  
20 pending SAVE verification.

21 Q. And then we discussed the USCIS Denial  
22 Letter which was also part of Exhibit 18, right?

23 A. Yes.

24 Q. Now, why did there need to be a new 2444

1 and 2445 after July 2nd? Or let me ask it this  
2 way: Before July 2nd, 2018 there were still  
3 some people whose information was being run  
4 through SAVE, correct?

5 A. Yes.

6 Q. So were there existing documents that  
7 provided notice of a pending SAVE verification  
8 and provided notice of a denial?

9 A. No.

10 Q. So how did those people get notified  
11 before?

12 A. They coordinated with the deputy  
13 registrar and the license control department.

14 Q. But there was no standard form?

15 A. No.

16 Q. You just -- people were individually  
17 notified in different ways?

18 A. However the deputy registrar discussed  
19 it with the customer. I can't speak for the  
20 processes that they had for it, but there was no  
21 formal document similar to the 2444 or 45.

22 Q. And why did the BMV decide to make -- go  
23 from a system of not having formal documents to  
24 hand out to having formal documents to hand out?

1           A. I can't speak to that. It was made by  
2     the previous administration.

3           Q. You don't know why?

4           A. I don't know.

5           Q. But you were the director at that  
6     time -- right? -- of license control?

7           A. I was customer service manager of  
8     license control as of January, February 2018 so  
9     I followed the policies that were in place at  
10    the time, but I don't know why the policy was  
11    implemented to not give similar documents to the  
12    customers.

13          Q. Do you think there's anyone at the BMV  
14    that would know that?

15          A. The administration has changed so I  
16    don't believe so.

17          Q. And then let me ask about the overall  
18    change from pre July 2nd, 2018 to July 2nd, 2018  
19    and going forward. Why did the BMV decide to  
20    change who is run through -- who's required to  
21    be run through SAVE?

22          A. I don't know the exact reason. I just  
23    know the decision was made to, across the board,  
24    verify everyone that has been presented a USCIS

1 document. I know it was just made in  
2 accordance -- the Real ID Act stated that if  
3 they're being issued a compliant credential,  
4 they must have their legal presence status  
5 verified if they're presenting a verifiable  
6 document such as a U.S. passport, and that  
7 included we decided to implement SAVE  
8 verification across the board for all  
9 individuals presenting USCIS documentation for a  
10 compliant or standard issuance.

11 Q. Was there a concern before July 2nd,  
12 2018 there were certain groups of noncitizens  
13 who weren't being run through SAVE and that was  
14 resulting in people being issued licenses who  
15 weren't eligible for them?

16 A. Not to my knowledge. I don't know. I  
17 can't speak to that.

18 Q. Have you ever heard anyone in the BMV  
19 say that that might have been a reason to do it?

20 A. No.

21 Q. To make the change? No? Okay.

22 Just to go back to Exhibit 17, all  
23 refugees no matter when they entered the United  
24 States now have to have their information run

1 through SAVE if they apply for an Ohio  
2 credential, correct?

3 A. Can you repeat that? I'm sorry.

4 Q. All refugees, people who are currently  
5 in refugee status, have to have their  
6 documentation run through SAVE to be able to get  
7 any kind of license, correct?

8 A. They may or may not have their refugee  
9 information entered depending on the date that  
10 they entered the U.S. per our policy.

11 Q. Say more about that.

12 A. Well, as we discussed earlier, if they  
13 have the I-797 with the 485 because their  
14 refugee stamp is over two years and that I-797  
15 will be entered in and their status will be  
16 verified.

17 Q. Their I-94 number wouldn't be entered in  
18 in that case?

19 A. It may or may not be depending on the  
20 document they have at the time. They have to  
21 enter either the alien number or I-94 number  
22 when they're presenting an I-797 for  
23 verification.

24 Q. If a refugee had been here for more than



1 two years and presented an I-94 as their sole  
2 proof of legal presence, I understand that that  
3 person wouldn't be permitted to apply with that  
4 as their sole purpose of legal presence,  
5 correct?

6 A. Correct.

7 Q. Assuming, though, for a minute that they  
8 could be entered into SAVE -- or I'm sorry.  
9 Assuming for a minute that the deputy registrar  
10 did allow them to apply, if they entered in  
11 their I-94 number and their name and date of  
12 birth, could USCIS verify that that I-94 is an  
13 accurate document?

14 MR. HONEN: Objection. I think it's --  
15 the question seems a bit confusing and it's a  
16 hypothetical. It's a confusing hypothetical.

17 MS. BROWN: I will restate it to try to  
18 make it less confusing, because I want to make  
19 sure that I get a good answer.

20 BY MS. BROWN:

21 Q. So assuming that an I-94 was the only  
22 document that the person had for legal presence,  
23 and they've been here for more than two years,  
24 if the deputy registrar inputted their I-94

1 number and their name and date of birth into  
2 this system, could USCIS verify that I-94  
3 document?

4 A. Possibly. Depends on the response that  
5 USCIS gives. We have no knowledge of the  
6 response that USCIS may or may not give. We  
7 have no list of responses. They provide the  
8 response and we interpret it as such. Is there  
9 a chance, which is the question? Assumably so  
10 there's a chance for every document we enter to  
11 be verified.

12 Q. So if USCIS verifies that document that  
13 means that this refugee has legal presence,  
14 correct?

15 A. If that's a response they provide, yes.

16 Q. So would there be any reason not to  
17 issue them a license?

18 A. Other than current BMV policy holds that  
19 if it's over two years old they're required to  
20 have the I-485.

21 Q. I understand the BMV policy doesn't  
22 permit them to get a license, but would there be  
23 any concern that they weren't legally present if  
24 USCIS verified that the I-94 was valid and they

1 were in refugee status?

2 A. Based on the interpretation of our  
3 response, no.

4 Q. Turning to -- actually just a little bit  
5 more on topic 18. Okay. So we're talking about  
6 the policy change before July 2nd and after  
7 July 2nd. To verify certain categories of  
8 people -- certain categories of noncitizens and  
9 now all noncitizens are verified, correct?

10 A. Yes.

11 Q. Do you know why that change was made?

12 A. No.

13 Q. You've never talked to anybody at the  
14 BMV who's indicated why that might have been --  
15 why that policy might have changed?

16 A. No.

17 Q. So I know we talked about the July 2nd,  
18 2018 is the date that the compliant cards became  
19 available as well, right?

20 A. Yes.

21 Q. Okay. So is that related to the reason  
22 why all noncitizens became subject to  
23 verification through SAVE, or is it not related?

24 A. My understanding is that once the

1 systematic changes were made to allow for SAVE  
2 verification for a compliant credential, the  
3 decision was made to implement it across the  
4 board to all U.S. citizens that have those  
5 appropriate documents and non-U.S. citizens.

6 Q. Is the BMV's position that it wasn't --  
7 let me back up.

8 So now there are standard licenses and  
9 compliant licenses, right?

10 A. Yes.

11 Q. And is the BMV's position that before  
12 July 2nd, 2018 no licenses were compliant before  
13 then?

14 A. I believe they may have considered them  
15 what they called materially compliant, but they  
16 weren't compliant per the Real ID Act so they  
17 weren't truly a compliant credential.

18 Q. Explain what materially compliant means.

19 A. It fell within some guidelines of what  
20 was the Real ID Act -- or what is the Real ID  
21 Act, but it didn't follow all the guidelines so  
22 they didn't qualify under the federal Real ID  
23 Act.

24 Q. Okay. If a refugee comes in with an

1 I-94 that is dated one year and nine months ago  
2 and it is entered into this screen on Exhibit 17  
3 as their sole lawful presence document, USCIS  
4 can verify that document, right?

5 A. Sure, yes.

6 Q. And so would it come -- when it says a  
7 document has been verified, does that mean that  
8 USCIS considers that person lawfully present?

9 A. It just means USCIS provides a response  
10 that says whatever their status is, if it's a  
11 student, a refugee, if they're employment  
12 authorized, if they're admitted as an asylee, it  
13 just means that they verified their status.

14 Q. Does that mean -- does it also mean that  
15 the document is current and unexpired?

16 A. It just means that USCIS has verified  
17 their status. We don't -- I can't speak for the  
18 responses that USCIS provides except for what  
19 they provide to us or their own interpretation  
20 of their response.

21 Q. Let's move on to 16. We've already  
22 covered how cosigner information is inputted  
23 into BASS, and we covered how the SAVE system --  
24 what is inputted into BASS for transmission to

1 the SAVE system.

2 Is Exhibit 17 the only legal presence  
3 information that would be inputted into BASS by  
4 the deputy registrars for an applicant?

5 A. For purposes of verification, yes. They  
6 capture it when they're selecting what documents  
7 are required to be scanned, but it's the only  
8 time they enter in information for legal  
9 presence to be verified for SAVE. There is --

10 Q. Go ahead.

11 A. There is a passport verification process  
12 for United States passports. So that's also  
13 related to legal presence, but it's not  
14 associated with SAVE.

15 Q. What about not per se verification  
16 purposes but just for issuance of the license,  
17 do they collect -- does the deputy registrar  
18 employee collect any additional information in  
19 BASS related at all to legal presence?

20 A. Unless it's for purposes of scanning the  
21 document, no.

22 Q. Returning to Exhibit 5. This section of  
23 the drivers manual deals with credential  
24 issuance procedures, Chapter 3 of the drivers

1 manual.

2 A. What page? I'm sorry.

3 Q. I'm sorry. Page 149. Now, in section  
4 B2 under personal information, if an Ohio  
5 credential is not presented, it says the BMV  
6 5745 must be scanned, correct?

7 A. Say that one more time. I'm sorry.

8 Q. Under B2 b ii it says -- so in response  
9 to the question was an Ohio credential  
10 presented, it says, if no is selected, then the  
11 BMV 5745 must be scanned. Do you see that?

12 A. Yes.

13 Q. So if a person getting a credential for  
14 the first time is -- if someone is applying to  
15 get a credential for the first time, this  
16 particular form has to be filled out, correct?

17 A. Yes. That is the application for the  
18 DL/ID.

19 Q. And that's the one that you said in  
20 Exhibit 19 does not -- was not -- is not a new  
21 form?

22 A. Correct. It was in existence prior.

23 Q. And has that form changed since  
24 July 2nd, 2018?

1 A. Yes.

2 Q. How did it change?

3 A. Before July 2nd, 2018 it changed to add  
4 the fact that the applicant was applying for a  
5 compliant credential. So it's a double-sided  
6 form now as well as it -- there were some  
7 maneuvering of the information that's captured  
8 on there to make it just make more logical sense  
9 to the deputy registrar.

10 Q. Okay. In section b ii e here it uses  
11 the phrase PDPS checks and PDPS match. What  
12 does that mean?

13 A. The PDPS is the Problem Driver Point  
14 System. It's the national database that holds  
15 license information for individuals that may  
16 have a block or unpaid suspension in another  
17 state.

18 Q. In section C where it says, was license  
19 control contacted for document approval, would  
20 that just be document approval related to legal  
21 presence documents?

22 A. It's anything that they're asking  
23 questions about relating to document approval.

24 Q. Could that include identification --



1 identity documents like a foreign passport or  
2 something like that?

3 A. Yes.

4 Q. So license control will approve those  
5 kinds of documents sometimes as well?

6 A. If they have a question speaking to a  
7 passport specifically, yes. As I said, we don't  
8 issue solely based on the passport if they don't  
9 have legal presence contained in the passport,  
10 but yes.

11 Q. Turning to N, which is page 157. Before  
12 we talk about section N, we were discussing a  
13 minute ago foreign identity document  
14 verification. If someone had a type of Visa  
15 that required a valid foreign passport, would  
16 that be the kind of thing that they would call  
17 license control to get approval of?

18 A. Yes.

19 Q. In section N, Social Security Online  
20 Verification, we're on page 157 now. I think we  
21 may have gotten to this a little bit earlier,  
22 but the Social Security number verification  
23 process involves comparing the Social Security  
24 number that the applicant presents with what the

1 Social Security Administration has on file,  
2 right?

3 A. It's the name, date of birth, and the  
4 Social Security number.

5 Q. Okay. And is that -- is that  
6 verification like a fairly quick process?

7 A. It's immediate.

8 Q. Is that done through BASS similarly to  
9 SAVE or in a different way?

10 A. It communicates with BASS through  
11 another system to get to SSA, but yes.

12 Q. Is the Social Security card uploaded or  
13 the number's just entered?

14 A. If it's required to be scanned based on  
15 the application, such as a compliant credential  
16 issuance or non-U.S. citizen or whatever the  
17 other requirements are, the card may be scanned  
18 in, but for Social Security verification it's  
19 just the number and name and date of birth.

20 Q. And you said previously the cosigner  
21 would not have to go through this process?

22 A. Not for sole purpose of cosigning, yes.

23 Q. Just to flip back to Exhibit 19, what  
24 training did BMV staff get on the new forms that

1     you testified about in Exhibit 19?

2           A.   The BMV staff were given training  
3     depending on their individual sections and what  
4     their job duties are.   License control  
5     specifically received training on, you know,  
6     introduction to the new form and in particular  
7     the changes to the forms.

8           Q.   And was that -- who did that training?

9           A.   For license control it would have been  
10    myself and Chad after he arrived.

11          Q.   And did deputy registrar staff get  
12    training on these forms as well through this  
13    roundtable?

14          A.   I can't speak to what the staff received  
15    at the deputy registrar, only say deputy  
16    registrars may or may not have been present at  
17    the roundtable through the BMV-provided  
18    training, but I can't speak to what the deputy  
19    registrar trained their own staff on.

20          Q.   Is the roundtable mandatory?

21          A.   Yes, it is mandatory for the deputy  
22    registrar.

23          Q.   But not all their staff necessarily?

24          A.   Correct.

1 Q. And so you don't know what training, if  
2 any, the deputy registrar staff received on-site  
3 or elsewhere about the new forms?

4 A. No.

5 Q. Did the system where information for  
6 SAVE verification is uploaded through BASS and  
7 transmitted to SAVE, did that system get changed  
8 in the last two years?

9 A. It never existed prior to July 2nd.

10 Q. So prior to July 2nd --

11 A. 2018 obviously.

12 Q. Yeah. Prior to July 2nd, 2018 how was  
13 information transmitted to USCIS?

14 A. The agency provided a copy of the  
15 document via fax to license control. License  
16 control accessed the SAVE application through  
17 their provided website, and the information was  
18 input by license control into SAVE, and the  
19 response was given to the deputy registrar.

20 Q. Okay. So you all were sort of the  
21 middleman in that process and now it's more  
22 direct through the deputy registrars themselves?

23 A. Correct. It's done systematically  
24 through BASS inside of an internal website

1 application.

2 Q. Okay. Moving on to topic 19, does the  
3 BMV have any written policies or procedures  
4 regarding when it's appropriate for a BMV staff  
5 member to contact a federal immigration agency?

6 A. Not that I recall.

7 Q. Okay. If this type of policy existed,  
8 do you think you probably would have seen it?

9 A. Most definitely. I communicate with  
10 USCIS for SAVE verification if there's a delay  
11 in their verification, but other than that I  
12 don't reach out to SAVE. USCIS I should say.

13 Q. Okay. Sorry. I don't know if that was  
14 the answer to exactly what I asked. So the  
15 question I asked before --

16 MS. BROWN: Actually, would you read  
17 back the question.

18 (Record read as requested.)

19 Q. So you don't -- and you don't -- they  
20 don't have a policy or you're not sure?

21 A. Not that I'm aware of.

22 Q. Okay. And if they did have such a  
23 policy, you would probably have seen it, right?

24 A. Yes.

1 Q. So and that -- there's no such policy  
2 with regard to USCIS specifically either?

3 A. No.

4 Q. The Department of Homeland Security?

5 A. No.

6 Q. Immigration and Customs Enforcement?

7 A. No.

8 Q. Can you think of a reason why anyone  
9 outside license control would call a federal  
10 immigration agency for any reason?

11 A. None that I can speak to. Other  
12 sections inside of the BMV may contact them for  
13 reasons related to their job duties, but I'm not  
14 privy to that information.

15 Q. Do you think the telecommunications  
16 department might?

17 A. I can't speak to that.

18 Q. Do you know of any time that anyone in  
19 another department besides license control  
20 contacts USCIS, DHS, ICE or any other federal  
21 immigration agency?

22 A. I know investigations may contact them  
23 for purposes of their own that I'm not exactly  
24 aware of all of the purposes that they may.

1 other than that, no.

2 Q. And you said that you yourself have  
3 sometimes had occasion to call a federal  
4 immigration agency or department?

5 A. Related to SAVE verification purposes,  
6 yes.

7 Q. Have you ever had a contact with any of  
8 those agencies that didn't have to do with SAVE  
9 verification?

10 A. No.

11 Q. Have you ever had to call USCIS for  
12 advice on any immigration matter or legal  
13 presence documentation issue related to your  
14 work at license control?

15 A. Not unless it's related to SAVE  
16 verification.

17 Q. And when you call for SAVE verification  
18 matters, there's not a specific policy or  
19 procedure around when you're supposed to call?

20 A. No.

21 Q. When do you usually find it appropriate  
22 to call?

23 A. Oftentimes if there's a situation where  
24 the BMV does not understand the response

1 provided by SAVE, if it doesn't line up with  
2 something that we expected to receive as in they  
3 provide a response that is completely different  
4 than the document that we provided to them, or  
5 if it's taking, you know, an exorbitant amount  
6 of time to verify that document, USCIS provided  
7 us with guidelines verbally that if the  
8 verification process takes longer than 30 days  
9 then we should reach out to them as well.

10 Q. And who do you call at SAVE?

11 A. SAVE has their own help desk.

12 Q. So it's like a hotline number that a lot  
13 of BMVs around the country presumably...

14 A. Yeah. It's a number that's available to  
15 the public as well. So when you call the  
16 number, it directs you to whether you're a state  
17 agency or an outside customer, not associated  
18 with an agency.

19 Q. All right. Topic 20. Other than  
20 inputting documents to the SAVE system via BASS  
21 are deputy registrars authorized by the BMV to  
22 have any communication with any federal  
23 immigration agency?

24 A. Not that I'm aware of.



1 Q. Is there an express prohibition by the  
2 BMV on that kind of communication?

3 A. Not that I'm aware of.

4 Q. Okay. Has the BMV ever encountered an  
5 instance where the deputy registrars -- where it  
6 came to your attention that the deputy  
7 registrars were calling immigration agencies?

8 A. No.

9 Q. So if they have an issue with SAVE, they  
10 always go through license control at the BMV?

11 A. Correct. They may contact their field  
12 representatives, you know, as I stated earlier  
13 in the day. If they have questions and the  
14 customer's not at the agency, they may contact  
15 their field rep to ask questions, but if it's  
16 directly related to issuance, then yes, they'll  
17 contact license control.

18 Q. Do the field reps ever contact USCIS or  
19 ICE or DHS or any other agency?

20 A. Not that I'm aware of.

21 Q. Would they ever contact SAVE about  
22 verification issues?

23 A. No, not that I'm aware of.

24 Q. Do you ever have any contact with the

1 Columbus field office of USCIS?

2 A. No.

3 Q. The Cleveland or Cincinnati field  
4 offices?

5 A. No.

6 Q. Do you have any idea if the deputy  
7 registrars ever reach out to those local field  
8 offices?

9 A. I'm not aware if they do. The only  
10 advice we give related to any field office is  
11 that if the customers have questions and they  
12 don't want to wait on the call center line they  
13 should schedule an appointment with those  
14 offices, but other than that I'm not aware of  
15 any communication given to the customer.

16 Q. And do deputy registrars ever receive  
17 any training from a federal immigration agency?

18 A. Not that I'm aware of.

19 Q. USCIS?

20 A. Not that I'm aware of.

21 Q. ICE?

22 A. No.

23 Q. Okay. 21. I think we've covered most  
24 of this in earlier topics, but we previously

1 discussed the difference between being denied  
2 and being not permitted to apply. If the  
3 customer isn't permitted to apply, does the BMV  
4 require the deputy registrars to give any kind  
5 of explanation to the customer?

6 A. We advise them as license control to let  
7 the customer know that the reason we're not  
8 completing the application is because this  
9 document is missing. If you are able to obtain  
10 this document, then we'll proceed with an  
11 application unless there's something else that's  
12 discovered that is missing.

13 Q. And is that -- do you encourage them to  
14 do that verbally or in writing?

15 A. Yeah, verbally when they contact license  
16 control.

17 Q. There's no form or notice that is issued  
18 to them, though?

19 A. Not for license control.

20 Q. Do you know if the deputy registrars  
21 have their own forms?

22 A. I can't speak to the deputy registrar.

23 Q. If a deputy registrar -- if an applicant  
24 comes into a deputy registrar and the deputy

1 registrar looks at their legal presence  
2 documentation and thinks it's insufficient, are  
3 they required to contact license control or is  
4 it just if they need your advice?

5 A. On an as-needed basis.

6 Q. Okay. So there's no requirement that  
7 they have to contact license control before  
8 turning someone away?

9 A. No.

10 Q. Okay. Topic 22. So I know you said  
11 that license control does not authorize deputy  
12 registrars to seize documents related to legal  
13 presence for any reason. Do they ever authorize  
14 the deputy registrars to make a copy of, say, an  
15 I-94 or some other legal presence document, or  
16 is that not authorized either?

17 A. We won't advise them to make copies of,  
18 seize, keep, confiscate, however you want to say  
19 it, documents for those purposes. We advise  
20 them to scan the documents in for BASS purposes  
21 for related to issuance, but nothing else.

22 Q. You advise them to scan them in even if  
23 they have to tell the customer they can't apply?

24 A. No. Only if they're completing the

1 application they scan the documents.

2 Q. Just to clarify. Thanks.

3 And I know you said that if a person  
4 isn't permitted to apply their information will  
5 not be entered into BASS, correct?

6 A. Correct.

7 Q. So I assume that means there's no -- the  
8 BMV doesn't track in any way the people who have  
9 come to apply but were not permitted to apply?

10 A. Correct.

11 Q. And if such a person eventually got a  
12 license after coming back with additional  
13 documents or if their status changed or  
14 something like that, there would be no record  
15 that they had previously tried to apply?

16 A. Correct.

17 Q. Does the BMV have any idea how many  
18 noncitizens each year are told by deputy  
19 registrars that they can't apply due to  
20 insufficient legal presence documentation?

21 A. No.

22 Q. So I assume there's also no way of  
23 knowing which deputy registrars have turned the  
24 most or the least people away?

1 A. No.

2 Q. And there wouldn't be any way of  
3 figuring that out for refugees specifically?

4 A. No.

5 Q. Okay. Or for minors who don't have a  
6 cosigner specifically?

7 A. No.

8 Q. In the phone logs, which we'll discuss  
9 in more detail in a later topic, but related to  
10 this tracking issue in topic 22 would those  
11 phone logs -- would you be able to piece  
12 together from a phone log an applicant's name  
13 and the fact that they had insufficient proof of  
14 legal presence?

15 A. The intent is that information is  
16 captured in the phone log, yes.

17 Q. And the phone logs are all maintained --

18 A. Yes.

19 Q. -- subject to the retention policy?

20 A. Yes.

21 Q. Okay.

22 MS. BROWN: We're on Exhibit 20.

23 --0--

24 (Deposition Exhibit 20 marked.)

1 --0--

2 BY MS. BROWN:

3 Q. Topic 23.

4 MR. HONEN: I believe 23 is  
5 Mr. Ballinger's topic.

6 MS. BROWN: I thought 24 --

7 MR. HONEN: I think it's 23 and 24.

8 MS. BROWN: Could you tell me what his  
9 topics are?

10 MR. HONEN: I believe it was --

11 MS. BROWN: Is it 13, 17, 23 and 24?

12 MR. HONEN: Correct.

13 MS. BROWN: Okay. 23 is related to 24  
14 so that works. All right. I guess we can still  
15 have the exhibit.

16 MR. HONEN: Sure. I think it may come  
17 up later. Okay.

18 BY MS. BROWN:

19 Q. So we'll do topic 25. When did the BMV  
20 first enact the policy that refugees with I-94s  
21 that are two years or older must also show an  
22 I-797C for proof of legal presence in addition  
23 to the I-94?

24 A. Based on conversations with current

1 administration, it predates everyone here so we  
2 don't know the time frame of when that was  
3 enacted.

4 Q. who all did you talk to that it  
5 predated?

6 A. My administrator, Tom Wilson, as well as  
7 the registrar's office.

8 Q. Okay. And so when you say it predated  
9 everybody, how long ago are we talking?

10 A. I believe administration that's  
11 previously there is 2015 or '14. I don't know  
12 the exact year.

13 Q. But presumably there were people  
14 working -- did Tom Wilson not work here before  
15 2015?

16 A. Not to my knowledge.

17 Q. Okay. What about -- was there anyone in  
18 the registrar's office that worked here before  
19 2015?

20 A. Not to my knowledge that's currently  
21 still here. I can't speak to that. I started  
22 in June 2016, and to my knowledge, no.

23 Q. So do you have electronic access or any  
24 other kind of access to old versions of the



1 Deputy Registrar Procedure Manual Proof of  
2 Identity Section?

3 A. There are records maintained of the old  
4 copies. I am not aware of how far back it goes  
5 or what the retention policy and what copies we  
6 have.

7 Q. As part of your preparation for this  
8 deposition did you look through old manuals to  
9 try to figure out when that policy might have  
10 come into existence?

11 A. Yeah. We attempted to find the date,  
12 but we could not.

13 Q. And how far back -- what's the farthest  
14 back version of the manual that you looked at?

15 A. If I recall, they were revision dates in  
16 2014 that I know I saw. I can't recall if there  
17 were earlier dates, however.

18 Q. And so in the 2014 version this policy  
19 with the I-797, I-94 policy was in effect?

20 A. Yes.

21 Q. So does the BMV not maintain copies of  
22 old versions of the registrar manual longer than  
23 five years ago?

24 A. There's a retention policy. I don't

1 know how long it is, but I know that as I said  
2 there are copies, but I can't recall how far  
3 back it goes.

4 Q. There are copies of what? I'm sorry.

5 A. Old documents, old manuals and  
6 procedures.

7 Q. But it may go back farther than 2014?

8 A. Possibly. I don't recall how far back  
9 it goes.

10 Q. What I'm trying to get at is did you  
11 only look at the one revised in 2014 because you  
12 couldn't find any others before 2014 or did you  
13 not look before 2014?

14 A. I don't recall a date earlier than that.  
15 I can't say definitively that they're not in  
16 existence. That's what was provided to me by  
17 the individual who maintains those documents.

18 Q. And who is that?

19 A. The publications coordinator I mentioned  
20 earlier.

21 Q. What's her name?

22 A. Tiffany Crawford.

23 Q. Okay. Was she the one that actually  
24 looked through the manuals for you or did you do

1 it?

2 A. I looked through the manuals.

3 Q. Did she have hard copies of old manuals?

4 A. Not that I recall. They're all digital.

5 Q. So she helped you look through the  
6 electronic version, or did she email them to  
7 you? How did it work?

8 A. She just provided the documents  
9 electronically. If I recall, they may have been  
10 through a CD since the file sizes were too large  
11 to email.

12 Q. And did you ask her to look at the  
13 oldest version of the Deputy Registrar Procedure  
14 Manual that she could find?

15 A. I asked her -- I don't remember the  
16 exact definition of the discovery, but it was  
17 whatever was in the request for information that  
18 was provided to us.

19 Q. So the request -- the discovery  
20 responses -- I will pull them out now. That was  
21 Exhibit 11. And I'm assuming that you're  
22 referring to interrogatory number five, page 8?

23 A. No.

24 Q. Is that what you're referring to?

1           A. No. I'm referring to the discussions  
2     that happened prior to -- it was just a request  
3     for information that was given to me. It may  
4     have been from Winston that just said, hey, can  
5     you provide us with old copies of the manual,  
6     and you know, go back to when you can, and the  
7     conversation happened with Tiffany, and she  
8     provided the copies that were appropriate with  
9     that, but it wasn't directly related to -- I  
10    misspoke when I said discovery. I attempted to  
11    clarify, but it was just a request for  
12    information that came down from Winston.

13          Q. So on interrogatory number five though  
14    on page 8, if you can just go back to that. You  
15    do see that interrogatory number five asks the  
16    question of on what date did the BMV implement  
17    the policy?

18          A. Yes.

19          Q. And you did not answer. You objected or  
20    your lawyer objected. Is that correct?

21          A. Yes.

22          Q. Okay. Did you try to figure out the  
23    answer to that question?

24          A. We could not come up with a conclusive

1 answer, yes.

2 Q. Normally, when a policy is changed in  
3 the deputy registrar manual, will there be  
4 written records that the BMV keeps relating to  
5 drafts of the policy or discussions about the  
6 merits of changing the policy versus keeping it  
7 the same, that kind of thing?

8 A. I'm not privy to the discussions that  
9 happen until I see the document. And since I  
10 have been employed, I can remember broadcasts  
11 being distributed with changes to the policy,  
12 but I can't speak of what occurred prior to. I  
13 don't know if every change to a manual or policy  
14 warranted a broadcast, or what documents or  
15 records were maintained to implement that  
16 policy.

17 Q. Okay. So, again, I just want to make  
18 certain I understand. You're not sure if there  
19 exists previous editions of the deputy registrar  
20 manual before 2014, if they're even in existence  
21 and maintained?

22 A. Correct.

23 Q. And you have not asked Tiffany Crawford  
24 directly if she has older versions than 2014?

1           A.   No.

2           Q.   And why did you not ask her that?

3           A.   Once I asked around if anyone's aware of  
4   the change in policy and once I asked, as I  
5   discussed, the administrator and registrar's  
6   office, no one was aware and I did not consult  
7   Tiffany at that point.

8           Q.   Okay.

9           MR. HONEN:  Can we take a break, please?

10                               (Recess taken.)

11                               --O--

12                               Thereupon, the testimony of May 23,  
13   2019, was adjourned at 2:52 p.m.

14                               --O--

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1 CERTIFICATE

2 STATE OF OHIO :  
3 COUNTY OF FRANKLIN : SS:

4 I, Julia Lamb, RPR, CRR, a Notary  
5 Public in and for the State of Ohio, duly  
6 commissioned and qualified, do hereby certify  
7 that the within-named DEREK CASPER was first  
8 duly sworn to testify to the truth, the whole  
9 truth, and nothing but the truth in the cause  
10 aforesaid; that the testimony then given was  
11 reduced to stenotypy in the presence of said  
12 witness, afterwards transcribed; that the  
13 foregoing is a true and correct transcript of  
14 the testimony; that this deposition was taken at  
15 the time and place in the foregoing caption  
16 specified.

17 I do further certify that I am not a  
18 relative, employee or attorney of any of the  
19 parties hereto; that I am not a relative or  
20 employee of any attorney or counsel employed by  
21 the parties hereto; that I am not financially  
22 interested in the action; and further, I am not,  
23 nor is the court reporting firm with which I am  
24 affiliated, under contract as defined in Civil  
25 Rule 28(D).

26 In witness whereof, I have hereunto  
27 set my hand and affixed my seal of office at  
28 Columbus, Ohio, on this 6th day of June, 2019.

29

30

31

32

*Julia Lamb*

33 Julia Lamb, RPR, CRR  
34 Notary Public, State of Ohio.

35 My commission expires: 10-10-22

36





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